

# EXHIBIT G

1                   IN THE UNITED STATES DISTRICT COURT  
2                   FOR THE NORTHERN DISTRICT OF NEW YORK  
3                   CIVIL ACTION NO.: 20-CV-01413

4   The Estate of Joseph P. King,  
5   by and through its Administrator  
6   ad Prosequendum Amy King,  
7   and in her own right,

8                   Plaintiff,

9                   v.

10                  WARD, et al.,

11                  Defendant.

---

12                   \*\*\*\*\*

13                   REMOTE VIDEO DEPOSITION OF DR. LI-WEN LEE

14                   JUNE 17, 2022

15                   \*\*\*\*\*

16

17                  REMOTE VIDEO DEPOSITION OF DR. LI-WEN LEE taken in the  
18   above-styled and numbered cause on June 17, 2022, commencing  
19   at 10:06 a.m. Eastern Standard Time, before Gina Williams,  
20   Registered Professional Reporter, Certified Realtime  
21   Reporter, and Certified Realtime Captioner.

22  
23  
24  
25

## A P P E A R A N C E S

(All attorneys appearing remotely)

On behalf of Plaintiff:

HACH ROSE SCHIRIPA & CHEVERIE, LLP  
112 Madison Avenue, 10th Floor  
New York, New York 10016

By: YAMILE KALKACH, ESQUIRE  
HILLARY NAPPI, ESQUIRE

On behalf of Defendants:

NEW YORK STATE ATTORNEY GENERAL  
SYRACUSE REGIONAL OFFICE  
300 South State Street  
Suite 300  
Syracuse, New York 13202

By: AIMEE COWAN, ESQUIRE

QUOTATION MARKS ARE USED FOR CLARITY AND DO NOT  
NECESSARILY REFLECT A DIRECT QUOTE

## I N D E X

| WITNESS | PAGE |
|---------|------|
|---------|------|

|                |  |
|----------------|--|
| DR. LI-WEN LEE |  |
|----------------|--|

|                            |   |
|----------------------------|---|
| Examination by Ms. Kalkach | 4 |
|----------------------------|---|

- - - -

## E X H I B I T S

| Number |  |
|--------|--|
|--------|--|

|           |                   |    |
|-----------|-------------------|----|
| Exhibit A | Amended Complaint | 21 |
|-----------|-------------------|----|

|           |                             |    |
|-----------|-----------------------------|----|
| Exhibit B | Answer to Amended Complaint | 23 |
|-----------|-----------------------------|----|

|   |   |
|---|---|
| <p>Page 4</p> <p>1 WHEREUPON,</p> <p>2 DR. LI-WEN LEE</p> <p>3 was called as a witness and, after having been first duly</p> <p>4 sworn, was deposed and testified as follows:</p> <p>5 EXAMINATION</p> <p>6 BY MS. KALKACH:</p> <p>7 Q Good morning, Ms. Lee. My name is Yamile</p> <p>8 Kalkach. I'm with the law firm that represents the</p> <p>9 Plaintiff, the Estate of Joseph King.</p> <p>10 Could you please state your full name and current</p> <p>11 address for the record?</p> <p>12 MS. COWAN: You mean business address, right?</p> <p>13 MS. KALKACH: Yeah.</p> <p>14 MS. COWAN: Okay.</p> <p>15 A My full name, you need it spelled?</p> <p>16 BY MS. KALKACH:</p> <p>17 Q Yes, please.</p> <p>18 A Li-Wen Lee, L-i - W-e-n, last name is Lee, L-e-e.</p> <p>19 My address is -- work address is New York State</p> <p>20 Office of Mental Health, New York City Field Office, 330</p> <p>21 Fifth Avenue, 9th floor, New York, New York 10001.</p> <p>22 Q Thank you.</p> <p>23 Ms. Lee, I'm going to go over a few ground rules</p> <p>24 to help you today so we can run this deposition as quickly</p> <p>25 and smoothly as possible.</p> | <p>Page 6</p> <p>1 your answer was based on that understanding.</p> <p>2 It is also important that you give verbal answers</p> <p>3 as opposed to a head nod so that the court reporter may take</p> <p>4 down your words, okay?</p> <p>5 A Okay.</p> <p>6 Q And it's also best not to talk over one another.</p> <p>7 Otherwise the court reporter is going to have a hard time</p> <p>8 writing down what we're saying.</p> <p>9 If at any time today you need a break, please</p> <p>10 just let me know, and we will accommodate.</p> <p>11 The only thing I ask from you is that if there's</p> <p>12 a question that hasn't been answered, it has to be answered</p> <p>13 before we take the break, okay?</p> <p>14 A Yes.</p> <p>15 Q Now, there may be many times today that your</p> <p>16 attorney may object to a question, but unless she directs</p> <p>17 you not to answer, then you still must answer, okay?</p> <p>18 A Okay.</p> <p>19 Q Now, please turn off all other devices that you</p> <p>20 have around you, cell phone, Apple watch, iPad, computers,</p> <p>21 et cetera, or put them on mute or silent.</p> <p>22 A Okay.</p> <p>23 Q Please also close any other documents or programs</p> <p>24 on your screen other than Zoom and the ones that -- other</p> <p>25 than the ones I'll be showing you today.</p> |
| <p>Page 5</p> <p>1 Have you ever been deposed before?</p> <p>2 A It's been a long time. Once before.</p> <p>3 Q Have you ever testified at trial?</p> <p>4 A What kind of trial?</p> <p>5 With mental hygiene hearings, yes.</p> <p>6 Q What was the nature of the case where you were</p> <p>7 deposed before?</p> <p>8 A This was related to policy on transgender</p> <p>9 treatment.</p> <p>10 Q Do you remember the caption of the case?</p> <p>11 A No, I don't.</p> <p>12 Q Do you understand that you are under oath today?</p> <p>13 A Yes.</p> <p>14 Q And that this is the same oath that you would</p> <p>15 take in a courtroom?</p> <p>16 A Yes.</p> <p>17 Q Are you on any medications which may affect your</p> <p>18 ability to testify truthfully today?</p> <p>19 I'm sorry?</p> <p>20 A No.</p> <p>21 Q If you don't hear or understand a question that I</p> <p>22 ask you, please feel free to ask me to repeat or rephrase</p> <p>23 the question, and I will.</p> <p>24 That also means that if you answer a question</p> <p>25 that I ask, I will assume you understood the question and</p>   | <p>Page 7</p> <p>1 A Okay.</p> <p>2 Q Do you have any paper documents in front of you?</p> <p>3 A I have a question.</p> <p>4 Should I be opening up the exhibit link now, or</p> <p>5 is that --</p> <p>6 Q No, we will do that. You don't have to be --</p> <p>7 A Okay.</p> <p>8 Q So there's no other paper documents in front of</p> <p>9 you?</p> <p>10 A No.</p> <p>11 Q Okay. Is there anyone else in the room with you?</p> <p>12 A No.</p> <p>13 Q Are you under the influence of any drugs or</p> <p>14 alcohol that in any way may affect the testimony which you</p> <p>15 are about to give?</p> <p>16 A No.</p> <p>17 Q Okay. So what did you do to prepare for today's</p> <p>18 deposition?</p> <p>19 A For today's deposition, I spoke with Aimee Cowan,</p> <p>20 and I reviewed some older documents related to this case,</p> <p>21 including the psychological autopsy and some of the CNYPC</p> <p>22 policies.</p> <p>23 Q Which policies did you review?</p> <p>24 A Around risk assessment, risk management review</p> <p>25 practices at CNYPC.</p>  |

|   |   |
|---|---|
| <p>Page 8</p> <p>1 Q For how long did you meet with your counsel?</p> <p>2 A I think about an hour.</p> <p>3 Q Other than your counsel, was anyone else present?</p> <p>4 A No.</p> <p>5 Q Did you discuss today's depositions with anyone</p> <p>6 other than your counsel?</p> <p>7 A No.</p> <p>8 Q Have you ever used any other names?</p> <p>9 A No.</p> <p>10 Q Have you ever been convicted of a crime?</p> <p>11 A No.</p> <p>12 Q When were you born?</p> <p>13 A July 18, 1974.</p> <p>14 Q Where were you born?</p> <p>15 A Houston, Texas.</p> <p>16 Q Are you married?</p> <p>17 A Yes.</p> <p>18 Q Do you have kids?</p> <p>19 A Yes.</p> <p>20 Q Have you ever been subject of a disciplinary</p> <p>21 complaint?</p> <p>22 A No.</p> <p>23 Q Have any complaints or grievances been filed</p> <p>24 against you?</p> <p>25 A Not that I'm aware of.</p>  | <p>Page 10</p> <p>1 Article 10 hearings. It's a technical term in Article 10.</p> <p>2 Q Okay. And you told me you testified in a</p> <p>3 deposition.</p> <p>4 When was this?</p> <p>5 A I don't remember the year. Maybe 10 years ago.</p> <p>6 Q What was the lawsuit about?</p> <p>7 A Over a provision of transgender treatment.</p> <p>8 Q What kind of witness were you?</p> <p>9 A Just explaining policy.</p> <p>10 Q Did you attend college?</p> <p>11 A Yes.</p> <p>12 Q Where did you go?</p> <p>13 A University of Texas.</p> <p>14 Q When did you go there?</p> <p>15 A 1992 to 1996.</p> <p>16 Q What did you major in?</p> <p>17 A Chemical engineering.</p> <p>18 Q And did you go to graduate school?</p> <p>19 A I went to medical school.</p> <p>20 Q When did you go to medical school?</p> <p>21 A 1996 to 2000.</p> <p>22 Q When did you become a medical doctor?</p> <p>23 A In 2000 when I received my medical degree.</p> <p>24 Q Do you have any other licenses?</p> <p>25 A No. Just medicine.</p>  |
| <p>Page 9</p> <p>1 Q Have you ever been a party of a lawsuit before?</p> <p>2 A Not personally.</p> <p>3 Q So you told me you testified in court.</p> <p>4 When was this?</p> <p>5 A I'm sorry. I'm trying to think back. It's been</p> <p>6 a while.</p> <p>7 Q That's okay.</p> <p>8 A I was a clinician up until 2008. So back then</p> <p>9 there would have been occasional hearings for treatment over</p> <p>10 objection or retention hearings, those kinds of hearings,</p> <p>11 treatment hearings.</p> <p>12 After that in my OMH role, there were a handful</p> <p>13 of hearings related to Article 10 -- Mental Hygiene Law</p> <p>14 Article 10 type decisions. They've not been recent, not</p> <p>15 within a few years.</p> <p>16 Q When was the last time?</p> <p>17 A I don't remember the exact year, so I think if I</p> <p>18 came up with something, I would be guessing. Something</p> <p>19 pre-pandemic.</p> <p>20 Q Do you have an approximation, let's say, I</p> <p>21 mean --</p> <p>22 A I don't remember exactly. I'm sorry.</p> <p>23 Maybe 2018.</p> <p>24 Q What kind of witness were you?</p> <p>25 A I was the commissioner's designee for those</p> | <p>Page 11</p> <p>1 Q Where did you go to graduate school -- to med</p> <p>2 school?</p> <p>3 A University of Texas Medical Branch.</p> <p>4 Q Did you specialize in a specific field?</p> <p>5 A Psychiatry and then forensic psychiatry.</p> <p>6 Q Where did you specialize?</p> <p>7 A Sorry?</p> <p>8 Q Where did you specialize?</p> <p>9 A You mean where did I do my residency training?</p> <p>10 Q Yes.</p> <p>11 A I completed my residency training at Beth Israel</p> <p>12 Medical Center in New York City. And then I did my forensic</p> <p>13 psychiatry fellowship through Albert Einstein College of</p> <p>14 Medicine, Bronx.</p> <p>15 Q Besides what we have discussed, have you taken</p> <p>16 any other certification program or licensing program?</p> <p>17 A No.</p> <p>18 Q Could you briefly walk me through your employment</p> <p>19 history leading up to your current position?</p> <p>20 A After fellowship I took a position at Bellevue</p> <p>21 Hospital Center on the Inpatient Forensic Psychiatry Unit,</p> <p>22 and I was there as an attending psychiatrist, and then later</p> <p>23 as unit chief until 2008.</p> <p>24 So in 2008 I left Bellevue to come to the Office</p> <p>25 of Mental Health in a position of medical director for the</p> |

|   |   |
|---|---|
| <p>1 Division of Forensic Services, and I have been at OMH since<br/>2 that time.</p> <p>3 I have a different title. I'm no longer the<br/>4 medical director. Beginning in late 2019, I moved into the<br/>5 associate commissioner role. Someone else has the medical<br/>6 director role now.</p> <p>7 Q Okay. Now, what were the roles and<br/>8 responsibilities that you had at the Division of Forensic<br/>9 Services?</p> <p>10 A The Division of Forensic Services at OMH is<br/>11 responsible for working with the OMH Forensic Psychiatric<br/>12 Centers, as well as local jurisdictions around the<br/>13 statutorily mandated populations, and those include<br/>14 individuals who have been found unfit to stand trial and are<br/>15 in need of restoration to fitness to return to their legal<br/>16 proceedings, as well as the management of individuals who<br/>17 have been found not responsible by reason of mental disease<br/>18 or defect, not in terms of whether or not they reach that<br/>19 verdict, but what happens afterwards.</p> <p>20 There's also the state prison mental health<br/>21 services that are offered to individuals in state custody,<br/>22 both the inpatient program, as well as the<br/>23 correctional-based programs, and sex offender management<br/>24 under mental hygiene Article 10.</p> <p>25 So within the Division of Forensic Services,</p> | <p>Page 12</p> <p>1 Q What's the name of the position you have right<br/>2 now?</p> <p>3 A Associate commissioner for the Division of<br/>4 Forensic Services.</p> <p>5 Q Who do you report to now?</p> <p>6 A Now I report to --<br/>7 What's his title?<br/>8 -- deputy commissioner.</p> <p>9 Q What's the name of the deputy commissioner?</p> <p>10 A Jeremy Darman.</p> <p>11 Q Who reports to you?</p> <p>12 A We have a deputy director within the Division of<br/>13 Forensic Services who reports to me, and the medical<br/>14 director also directly reports to me.</p> <p>15 Q Do you know Ann Marie Sullivan?</p> <p>16 A I do know Ann Maria Sullivan.</p> <p>17 Q You do?</p> <p>18 A Yes.</p> <p>19 Q What is your relationship with her?</p> <p>20 A She is the commissioner for the Office of Mental<br/>21 Health, and so I know her in her role as the commissioner<br/>22 for our agency.</p> <p>23 Q So do you have projects together?</p> <p>24 A There are times that we would -- she would have<br/>25 something that she would want looked into, or there are</p>                          |
| <p>Page 13</p> <p>1 we're not providing any of those services directly, but we<br/>2 are working with the facilities to help them with the<br/>3 responsibilities and the services that they're providing, as<br/>4 well as coordinating with any other stakeholders.</p> <p>5 So local jurisdictions that might have patients<br/>6 coming to and from services or the court systems<br/>7 correctional facilities, those kinds of parties. In broad<br/>8 strokes, that's --</p> <p>9 The medical director, the role was to provide<br/>10 some of that clinical insight and understanding into the<br/>11 services that were being provided to assist the central<br/>12 office in navigating those relationships, as well as helping<br/>13 the facilities in certain situations.</p> <p>14 Q Okay. Division of Forensic Services, how long<br/>15 did you work -- did you work there?</p> <p>16 A Since 2008.</p> <p>17 Q To whom did you report?</p> <p>18 A As a medical director, I would report to the<br/>19 associate commissioner.</p> <p>20 Q Both?</p> <p>21 I'll separate it.</p> <p>22 To whom did you report when you were medical<br/>23 director?</p> <p>24 A As medical director, I reported to whoever the<br/>25 associate commissioner was at the time.</p>  | <p>Page 14</p> <p>1 overall agency projects that the division might be<br/>2 participating in.</p> <p>3 We do not interact with her on a daily basis.</p> <p>4 Q Did you have a conversation with her before this<br/>5 deposition?</p> <p>6 A Not about this deposition.</p> <p>7 Q When was the last time that you spoke to her?</p> <p>8 A Today is Friday. I spoke to her on Tuesday.<br/>9 MS. COWAN: I think we lost you on video.<br/>10 Is anyone else able to see her?<br/>11 MS. KALKACH: For me it's the other way around.<br/>12 I cannot see anyone, I just noticed. Like I can see<br/>13 my --<br/>14 Oh, my God, what is going on?<br/>15 MS. COWAN: We can see you now.<br/>16 MS. KALKACH: You can see me?<br/>17 MS. COWAN: Yes.<br/>18 MS. KALKACH: I don't know what's going on with<br/>19 all my devices, apparently.<br/>20 MS. COWAN: Let's go off the record for a second.<br/>21 (Discussion was held off the record.)<br/>22 (Last question was read back.)<br/>23 BY MS. KALKACH:<br/>24 Q Did she reach out to you or you reach out to her<br/>25 or something else?</p> <p>Page 15</p> |

|   |  |
|---|--|
| <p>Page 16</p> <p>1 A I reached out to her. I had a question.</p> <p>2 Q So what was the sum and substance of this</p> <p>3 conversation?</p> <p>4 A I wanted to ask her about her thoughts on</p> <p>5 accreditation options for the Article 10 program.</p> <p>6 Q Did you have a conversation with her regarding</p> <p>7 this case?</p> <p>8 A No.</p> <p>9 Q Are you aware of what this lawsuit is about?</p> <p>10 A I think in large part, yes.</p> <p>11 Q How did you become aware of that information?</p> <p>12 A When I was contacted in terms of the</p> <p>13 deposition -- this deposition.</p> <p>14 Q So when you say "in large part, yes," what does</p> <p>15 that entail?</p> <p>16 A That this is about an inmate suicide -- inmate</p> <p>17 patient suicide.</p> <p>18 Q Do you know Mr. Hal Meyers?</p> <p>19 A I do know him, yes.</p> <p>20 Q What is your relationship with him?</p> <p>21 A He has had --</p> <p>22 He works for Central New York Psychiatric Center</p> <p>23 in corrections-based operations, so there are times when he</p> <p>24 will be at a meeting that the facility is having for</p> <p>25 different reasons.</p>  | <p>Page 18</p> <p>1 And then there's also forensics, which I've</p> <p>2 described in terms of the key areas that are covered or</p> <p>3 encompassed within forensics.</p> <p>4 But there are also the psychiatric centers, which</p> <p>5 is how direct services are organized. The psychiatric</p> <p>6 centers, some of them deliver only inpatient services. Some</p> <p>7 of them have an outpatient footprint as well. And they have</p> <p>8 their own structure of administration and supervision.</p> <p>9 BY MS. KALKACH:</p> <p>10 Q How many divisions does the Office of Mental</p> <p>11 Health have?</p> <p>12 A How many what?</p> <p>13 Q Divisions.</p> <p>14 A How many divisions?</p> <p>15 Q Yes.</p> <p>16 A I mean, I know it will sound odd, but I will</p> <p>17 actually need to look at it to count up the formal</p> <p>18 divisions. They're not all called divisions. Some are</p> <p>19 bureaus. It gets complicated.</p> <p>20 Q I'm going to move to strike the portions that are</p> <p>21 not responsive.</p> <p>22 And what is the objective of the Office of Mental</p> <p>23 Health for New York State?</p> <p>24 MS. COWAN: Objection.</p> <p>25 A The Office of Mental Health is a combination of</p> |
| <p>Page 17</p> <p>1 There is also a brief period when I had first</p> <p>2 started working at OMH within the Division of Forensic</p> <p>3 Services when he was also working within the Division of</p> <p>4 Forensic Services.</p> <p>5 I do not know how long he was there, but he was</p> <p>6 not there much longer after I got there.</p> <p>7 Q Did you have a conversation with him about this</p> <p>8 deposition?</p> <p>9 A No.</p> <p>10 Q Did you have a conversation with him before this</p> <p>11 deposition?</p> <p>12 A I've known him since 2008, so at various times</p> <p>13 I've talked to him.</p> <p>14 Q When was the last time that you spoke to him?</p> <p>15 A The last time that I've personally spoken to him</p> <p>16 has been quite some time. I cannot put a time frame on it</p> <p>17 because I don't remember. Not this year.</p> <p>18 Q How is the Office of Mental Health organized?</p> <p>19 MS. COWAN: Objection.</p> <p>20 A Well, it's --</p> <p>21 There are different components within the central</p> <p>22 office. Some of them are folks on the community side, some</p> <p>23 of them on licensing.</p> <p>24 There is an Adult &amp; Children's Division that</p> <p>25 focuses on civil -- the civil side.</p> | <p>Page 19</p> <p>1 providing mental health services in the public sector, as</p> <p>2 well as promoting and establishing policies for delivery of</p> <p>3 mental health services in New York State beyond the</p> <p>4 state-operated services.</p> <p>5 BY MS. KALKACH:</p> <p>6 Q What is the mission of the Office of Mental</p> <p>7 Health for New York State?</p> <p>8 A I can't quote it to you.</p> <p>9 Q Okay. Do you know the specific facts of this</p> <p>10 case?</p> <p>11 MS. COWAN: Objection.</p> <p>12 A I know facts about this case. I don't know if I</p> <p>13 know every single fact about this case that you might know</p> <p>14 or be thinking about.</p> <p>15 BY MS. KALKACH:</p> <p>16 Q Were you aware that Mr. King committed suicide in</p> <p>17 the New York State correctional facility?</p> <p>18 A Yes.</p> <p>19 Q Are you aware that Mr. King used his shoelaces to</p> <p>20 commit suicide?</p> <p>21 A Yes.</p> <p>22 Q Are you aware that Mr. King had already attempted</p> <p>23 to commit suicide with his shoelaces a couple of years</p> <p>24 before?</p> <p>25 A Yes.</p>   |



|   |   |
|---|---|
| <p>Page 20</p> <p>1 Q Did you ever talk about this lawsuit with anybody</p> <p>2 you work with?</p> <p>3 A With the lawsuit, only in the context of this</p> <p>4 deposition and being asked to come and testify.</p> <p>5 Q So, yes, you did?</p> <p>6 A Yes.</p> <p>7 Q Who did you speak to?</p> <p>8 A We have our counsel who notified me that somebody</p> <p>9 was needed to testify for the commissioner, and she sent me</p> <p>10 information connecting me with the Attorney General's</p> <p>11 Office.</p> <p>12 Q Okay. What are the names of these co-workers?</p> <p>13 A Peggy Drake. Margaret Drake.</p> <p>14 MS. COWAN: OMH counsel, just so you know.</p> <p>15 BY MS. KALKACH:</p> <p>16 Q When did you speak to them?</p> <p>17 A I think around the time that I was asked to</p> <p>18 testify for the deposition, which may be about a month ago</p> <p>19 or so, in order to understand what I was going to be</p> <p>20 speaking to.</p> <p>21 Q Okay. So what were the sum and substance of the</p> <p>22 conversation you had with the commissioner?</p> <p>23 A With the commissioner?</p> <p>24 Which conversation?</p> <p>25 I'm sorry. I don't understand.</p> | <p>Page 22</p> <p>1 MS. KALKACH: Technician, if you could please</p> <p>2 just scroll down. She doesn't have to read every word,</p> <p>3 just to see if she recognizes the document.</p> <p>4 BY MS. KALKACH:</p> <p>5 Q Dr. Lee, if you could please let me know when</p> <p>6 you're finished reviewing this document.</p> <p>7 A These complaints don't come to me.</p> <p>8 Q Are you finished reviewing the document?</p> <p>9 A I'm on page 2, but what I'm trying to say is, no,</p> <p>10 I did not read this before.</p> <p>11 MS. KALKACH: Okay. We can stop showing</p> <p>12 Exhibit A. Thank you.</p> <p>13 BY MS. KALKACH:</p> <p>14 Q Do you recognize the document which has been</p> <p>15 marked as Exhibit A?</p> <p>16 A You mean have I seen it before?</p> <p>17 I have not spent time with that document before.</p> <p>18 Q Do you recognize it?</p> <p>19 A What are you asking me by asking if I recognize</p> <p>20 it?</p> <p>21 Q Have you seen it before?</p> <p>22 A No, I haven't read that.</p> <p>23 Q But have you seen it before?</p> <p>24 You could have seen it, yet not read it.</p> <p>25 A I'm somewhat confused by that question.</p>               |
| <p>Page 21</p> <p>1 Q I'm sorry. I thought --</p> <p>2 I'm going to rephrase that.</p> <p>3 Can you please repeat the names of the two people</p> <p>4 you spoke with?</p> <p>5 A It was one person. I'm sorry. Peggy and</p> <p>6 Margaret are the same person.</p> <p>7 Q Okay. What was the sum and substance of the</p> <p>8 conversation with Margaret?</p> <p>9 MS. COWAN: Yeah, I'm going to object to that and</p> <p>10 direct her not to answer. That's an attorney that she</p> <p>11 was speaking with from OMH.</p> <p>12 BY MS. KALKACH:</p> <p>13 Q Do you remember when the lawsuit was filed?</p> <p>14 A No, I don't.</p> <p>15 MS. KALKACH: Off the record.</p> <p>16 (Discussion was held off the record.)</p> <p>17 MS. KALKACH: I offer Exhibit A into evidence, if</p> <p>18 you could please put Exhibit A.</p> <p>19 VIDEO TECHNICIAN: That will be marked; is that</p> <p>20 correct?</p> <p>21 MS. KALKACH: Yes, that's correct.</p> <p>22 (Exhibit A was marked for identification.)</p> <p>23 BY MS. KALKACH:</p> <p>24 Q Dr. Lee, please take a minute to review this</p> <p>25 exhibit.</p>  | <p>Page 23</p> <p>1 Q Is this the first time that you see the document</p> <p>2 that was marked as Exhibit A?</p> <p>3 A I believe so, yes. I haven't read it.</p> <p>4 MS. KALKACH: Okay. I'm going to move to strike</p> <p>5 the portions not responsive.</p> <p>6 Now I would like to mark Exhibit B into evidence.</p> <p>7 Could you please show it to her?</p> <p>8 BY MS. KALKACH:</p> <p>9 Q Please take a minute to review this exhibit, and</p> <p>10 when you're finished, let me know.</p> <p>11 A I'm sorry. It's too small.</p> <p>12 Q Is that better?</p> <p>13 A That's better.</p> <p>14 VIDEO TECHNICIAN: Did you want to take control</p> <p>15 and walk through the document, Ms. Lee, or did you just</p> <p>16 want to keep scrolling?</p> <p>17 THE WITNESS: You're fine.</p> <p>18 MS. COWAN: Were you going to ask if she's ever</p> <p>19 seen this before?</p> <p>20 MS. KALKACH: Yes, yes, but it's -- that's what</p> <p>21 I'm going to do.</p> <p>22 (Exhibit B was marked for identification.)</p> <p>23 BY MS. KALKACH:</p> <p>24 Q Just let me know if you're finished reviewing the</p> <p>25 document. I just want to know if you recognize it and if</p> |

|   |  |
|---|--|
| <p>1 you have seen it before.</p> <p>2 A I haven't seen it before, and I don't recognize</p> <p>3 it.</p> <p>4 MS. KALKACH: Okay. Thank you so much,</p> <p>5 Technician.</p> <p>6 BY MS. KALKACH:</p> <p>7 Q Have you signed any written statements or made</p> <p>8 any recorded statements or spoken to any attorneys or</p> <p>9 investigators or reporters about the events related to this</p> <p>10 lawsuit?</p> <p>11 A Not related to the lawsuit.</p> <p>12 Speaking with Aimee, counsel.</p> <p>13 Q Did you know Joseph King?</p> <p>14 A I do not know him, no.</p> <p>15 Q Before today have you ever heard about Mr. Joseph</p> <p>16 King?</p> <p>17 A Yes, I have.</p> <p>18 Q When did you hear about him?</p> <p>19 A At the time of his suicide, Central New York has</p> <p>20 a notification procedure, so they sent out notice.</p> <p>21 Q How did you receive notice?</p> <p>22 A E-mail notification saying that a suicide has</p> <p>23 occurred. It provides a little bit of basic information,</p> <p>24 where, when, that kind of thing.</p> <p>25 Q Do you remember this other information that was</p>  | <p>Page 24</p> <p>1 notices, I didn't mean 365 days. That was an inaccuracy. I</p> <p>2 meant for the last -- starting for 2022.</p> <p>3 Q I see. So approximately over a year --</p> <p>4 Okay, strike that.</p> <p>5 Is there an approximate number of notices that</p> <p>6 you receive per year since you have been working at the OMH?</p> <p>7 A Yeah, there's a range. It might be maybe 12 to</p> <p>8 20, in there somewhere. Every year is different.</p> <p>9 Q Do you have access to that information?</p> <p>10 A Yes, I do.</p> <p>11 Q Is there a yearly report, or where is this</p> <p>12 information?</p> <p>13 A We go over suicides on a recurring basis through</p> <p>14 the year to try to understand if there are trends or other</p> <p>15 areas to make a change.</p> <p>16 So we do talk about the numbers on an ongoing</p> <p>17 basis with Central New York.</p> <p>18 Q How often do you go over the suicide trends?</p> <p>19 A It depends. We talk about trends at least twice</p> <p>20 a year.</p> <p>21 Central New York talks about trends internally</p> <p>22 much more often than that.</p> <p>23 Q Once you have the meeting, is there a report that</p> <p>24 comes out of it or any official document at the conclusion</p> <p>25 of these meetings?</p> |
| <p>Page 25</p> <p>1 in the notice?</p> <p>2 A The usual notice is generally the same. It's got</p> <p>3 the location, the date, basic information, demographic</p> <p>4 information, age of the individual, some other diagnoses, if</p> <p>5 there was -- how suicided.</p> <p>6 It's usually very preliminary information, and</p> <p>7 it's considered just the notification.</p> <p>8 Q Do you know when he was incarcerated?</p> <p>9 A I believe that was starting in 2013.</p> <p>10 Q How many of these notices have you received in</p> <p>11 the past year?</p> <p>12 A In the past year?</p> <p>13 Q Yes.</p> <p>14 A I don't have that number accurately off the top</p> <p>15 of my head.</p> <p>16 If you want an estimate, I can give you an</p> <p>17 estimate.</p> <p>18 Q Yeah. Do you have an estimate?</p> <p>19 A Maybe in the last 365 days, 8 or so.</p> <p>20 Q In 2018 do you have an approximate of how many of</p> <p>21 these notices that you received?</p> <p>22 A 2018, the number varies somewhere between --</p> <p>23 2018, I don't remember the exact number. For 2018, there</p> <p>24 might have been around 15 or so.</p> <p>25 I'm sorry. When I said earlier about 6 or 8</p> | <p>Page 27</p> <p>1 A We don't make an official report. It's more of a</p> <p>2 discussion.</p> <p>3 Q Who was involved in the discussion?</p> <p>4 A There's --</p> <p>5 So there's a discussion to look at trends, which</p> <p>6 would involve the medical director for the Division of</p> <p>7 Forensic Services, deputy director for Central New York's</p> <p>8 corrections-based operations, director of suicide</p> <p>9 prevention, clinical director, chief psychologist, executive</p> <p>10 director, to talk about it.</p> <p>11 And they have also, again, their own meetings,</p> <p>12 including some meetings with Department of Corrections, to</p> <p>13 talk about suicide prevention.</p> <p>14 Q Are you aware of any policy regarding inmates</p> <p>15 with mental illness?</p> <p>16 MS. COWAN: Objection.</p> <p>17 A Central New York has a whole slew of policies</p> <p>18 around how they provide services to inmates with mental</p> <p>19 illness.</p> <p>20 BY MS. KALKACH:</p> <p>21 Q What are the names of these policies?</p> <p>22 A I don't know the names of all of them. There's a</p> <p>23 lot.</p> <p>24 They have a policy manual. If I need something,</p> <p>25 I'll look it up, but I don't have them off the top of my</p>                         |

|  |  |
|--|--|
| <p>1 head.</p> <p>2 Q Who creates these policies?</p> <p>3 A Central New York Psychiatric Center creates those</p> <p>4 policies to be consistent with OMH agency policies.</p> <p>5 Q And who approves the policies?</p> <p>6 A The facility policies, they have an internal</p> <p>7 policy approval that also involves their medical staff</p> <p>8 organization.</p> <p>9 Q So what I want to understand is, what is the</p> <p>10 process of creating a policy from beginning to end?</p> <p>11 A I'm not involved in their policy creation. I'm</p> <p>12 not sure I can describe that to you with any accuracy.</p> <p>13 Q Do you know how often the policies get updated?</p> <p>14 A That's going to depend. Sometimes I know that if</p> <p>15 they change a practice, they're going to update a policy.</p> <p>16 If they set up a new program, they're going to</p> <p>17 update the policy.</p> <p>18 If there's a change in a joint commission</p> <p>19 requirement, they'll change policy to be consistent.</p> <p>20 So there are different things that will trigger a</p> <p>21 policy update.</p> <p>22 Q Would a trend in suicide be something that would</p> <p>23 trigger a change in policy?</p> <p>24 A A trend by itself doesn't trigger a change in</p> <p>25 policy, but if there's a change in practice related to a</p>  | <p>Page 28</p> <p>1 A The psyche centers have their own structure of</p> <p>2 administration and supervision.</p> <p>3 When they identify a need, either one of these --</p> <p>4 Maybe a joint commission accreditation</p> <p>5 requirement has changed.</p> <p>6 Maybe they've decided to update a practice.</p> <p>7 Whatever it is, if they've decided that there's a</p> <p>8 need to change a policy, then they will pull the policies</p> <p>9 that are impacted by this change, and they have their own</p> <p>10 process to revise and review. I'm not qualified to speak to</p> <p>11 their internal steps.</p> <p>12 Q I understand.</p> <p>13 When you say "they," do you know what the</p> <p>14 position of the people that decide when to revise and review</p> <p>15 are?</p> <p>16 A I don't know if it's a specific person that</p> <p>17 you're looking for who would say, okay, it's time to revise</p> <p>18 a policy, but they have a team approach to administration</p> <p>19 and supervision.</p> <p>20 Q So this goes to my next question.</p> <p>21 Which department is in charge of overseeing the</p> <p>22 updates of the policies?</p> <p>23 A It's a combination I think in terms of</p> <p>24 responsibility for policy development. They have quality</p> <p>25 management involved. The clinical director would be</p> |
| <p>1 trend, then that would trigger a change in policy.</p> <p>2 Q Can you please explain this a little bit further?</p> <p>3 A I'm trying to think of a way to explain it.</p> <p>4 So systems of care in psychiatric centers</p> <p>5 included -- have quality management, quality improvement</p> <p>6 practices to review the care that's been delivered and</p> <p>7 review outcomes.</p> <p>8 If they identify a problem, then they look at how</p> <p>9 to -- whether it's a systemic issue or a one-time issue and</p> <p>10 try to make decisions about how to improve upon those</p> <p>11 issues, those problems, and sometimes those reviews result</p> <p>12 in deciding to make a modification to a policy.</p> <p>13 So it would depend. It's not always a specific</p> <p>14 trend. It might just be an area that they're continuously</p> <p>15 looking to improve upon, so maybe no specific trend, but</p> <p>16 just something that they think is better, and they might be</p> <p>17 responding to that.</p> <p>18 Q Understood.</p> <p>19 Who is in charge of updating the policies?</p> <p>20 A The facilities update their own policies.</p> <p>21 Q Do you know what the process from beginning to</p> <p>22 end for updating a policy is?</p> <p>23 A No, only generally. I don't know the beginning</p> <p>24 to end.</p> <p>25 Q Can you explain generally how it works?</p> | <p>Page 29</p> <p>1 involved, the deputy director.</p> <p>2 There might be other individuals, depending on</p> <p>3 what kind of policy it is.</p> <p>4 Q Who within the department is in charge of</p> <p>5 overseeing that the policies get updated?</p> <p>6 A I don't know who the specific person would be</p> <p>7 that they would give that to.</p> <p>8 Q Would they be in charge of the team that</p> <p>9 administers and supervises the policies?</p> <p>10 A Their policy development?</p> <p>11 I'm not involved in their process of policy</p> <p>12 development. These questions I don't know the specific</p> <p>13 answers to.</p> <p>14 Q Okay. After the policy is updated, do you know</p> <p>15 who is in charge of distribution?</p> <p>16 A I do not know who specifically is in charge of</p> <p>17 distribution.</p> <p>18 Q Do you know the position of the person that would</p> <p>19 be in charge of distribution?</p> <p>20 A No.</p> <p>21 All I know about policy distribution is that when</p> <p>22 they decide on a new policy, that they have a process of</p> <p>23 distributing it, but I do not get involved in how they do</p> <p>24 that.</p> <p>25 Q Okay. Do you know if it's an electronic or paper</p>  |
| <p>Page 30</p>   | <p>Page 31</p>   |

|  |  |
|--|--|
| <p>1 distribution?</p> <p>2 A I would imagine so.</p> <p>3 Q Both, electronic and paper or electronic or only</p> <p>4 paper?</p> <p>5 A I would have to guess.</p> <p>6 These days there's a lot of electronic</p> <p>7 distribution, and sometimes there's paper, and sometimes</p> <p>8 there's both.</p> <p>9 Q I'd rather not have you guessing.</p> <p>10 If you don't know, just --</p> <p>11 A I don't know. That's what I'm trying to say is,</p> <p>12 I don't know.</p> <p>13 Q Do you know who makes sure that the new policy</p> <p>14 gets delivered to their distribution destination?</p> <p>15 A No, I don't.</p> <p>16 Q Do you know who ensures that the policy gets</p> <p>17 taught to the people who are supposed to follow it?</p> <p>18 A No, I don't keep track of that either.</p> <p>19 Q Do you know --</p> <p>20 Do you know the amount of time that could pass</p> <p>21 between the update of a policy and the training of all the</p> <p>22 people that are obliged by a policy?</p> <p>23 MS. COWAN: Objection.</p> <p>24 A I can't answer that. I don't actually know.</p> <p>25</p>   | <p>Page 32</p> <p>1 psyche center for access.</p> <p>2 Q Do you get training on these policies, or do you</p> <p>3 learn them on your own?</p> <p>4 A No.</p> <p>5 I'm not a facility-based staff person. I</p> <p>6 wouldn't get training in their policies.</p> <p>7 Q At the facility centers, do you know who provides</p> <p>8 the training?</p> <p>9 A They have an admin training department who</p> <p>10 provides training.</p> <p>11 Q Do they get continuing training, or do they only</p> <p>12 train once?</p> <p>13 A I don't know their schedule for training, but I</p> <p>14 know that Central New York has a continuous approach to</p> <p>15 keeping their staff up to date.</p> <p>16 Q Do all the people that need to follow the policy</p> <p>17 receive training when they join the company?</p> <p>18 A You want to know if every new employee gets</p> <p>19 training?</p> <p>20 Q Yes.</p> <p>21 A All the employees are oriented to a facility and</p> <p>22 what they need to do.</p> <p>23 Q Do they get training in policies?</p> <p>24 A I have never sat in on their new employee</p> <p>25 training.</p>          |
| <p>Page 33</p> <p>1 BY MS. KALKACH:</p> <p>2 Q Have you read any of the policies regarding</p> <p>3 inmates with mental illnesses?</p> <p>4 A Some of them, yes.</p> <p>5 Q Which ones have you read?</p> <p>6 A I think I'd need to see the manual, and then I</p> <p>7 could tell you. I don't have those memorized.</p> <p>8 Q How long ago did you read them?</p> <p>9 A I read them on an ongoing basis, depending what</p> <p>10 I'm looking for, you know. There's --</p> <p>11 It can be sporadic, sometimes more often than</p> <p>12 others. I'm not sure how to answer that.</p> <p>13 Q Why did you read them?</p> <p>14 A Usually because I'm looking for how something is</p> <p>15 defined.</p> <p>16 There are a lot of different statutes that are</p> <p>17 put out or proposed that might impact how services are</p> <p>18 delivered, so I would refer to a policy to understand what</p> <p>19 that might mean.</p> <p>20 Q What did you learn about them?</p> <p>21 A What did I learn about what?</p> <p>22 Q About the policies as they existed, what did you</p> <p>23 learn about them?</p> <p>24 A Oh, I mean, every psyche center has policies.</p> <p>25 So when we're looking for policies, we ask the</p> | <p>Page 35</p> <p>1 Q Do you know if the training for the policies is</p> <p>2 voluntary or mandatory or something else?</p> <p>3 A I would have to assume. I'm not involved in</p> <p>4 their training.</p> <p>5 Q Now I'm going to go back a little bit about when</p> <p>6 we were speaking about the processes.</p> <p>7 Who would know all this information?</p> <p>8 MS. COWAN: Objection.</p> <p>9 BY MS. KALKACH:</p> <p>10 Q Who specific --</p> <p>11 Who would know the process from beginning to end</p> <p>12 for updating a policy?</p> <p>13 A Central New York administration would be.</p> <p>14 Q Are you aware of any document that has all this</p> <p>15 information?</p> <p>16 A There might be. I don't know.</p> <p>17 Q Okay. Are you aware of any policies regarding</p> <p>18 shoelaces and inmates?</p> <p>19 A Not specifically about shoelaces.</p> <p>20 Q Okay. Are correctional facilities assigned a</p> <p>21 mental health level?</p> <p>22 A Yes.</p> <p>23 Q Are you aware which facility Mr. King was housed?</p> <p>24 A He was at Mid-State.</p> <p>25 Q Do you know which mental health level was it</p> |

|   |  |
|---|--|
| <p>1 assigned?</p> <p>2 A I would want to check that to be sure instead of</p> <p>3 telling you what I think.</p> <p>4 Q So you don't know?</p> <p>5 A No.</p> <p>6 Q How do the correctional facilities obtain their</p> <p>7 health level?</p> <p>8 A It's decided jointly between OMH and the</p> <p>9 Department of Corrections in terms of where logistically</p> <p>10 they can set up services, how much capacity is needed.</p> <p>11 Q What is the relationship between Mid-State</p> <p>12 Correctional Facility and the Office of Mental Health of New</p> <p>13 York?</p> <p>14 MS. COWAN: Objection.</p> <p>15 A Are you asking --</p> <p>16 Well, so at Mid-State Correctional Facility, that</p> <p>17 is a facility operated by the Department of Corrections and</p> <p>18 Community Services, and they have their own hierarchy.</p> <p>19 Mental health services are provided on site by</p> <p>20 Central New York Psychiatric Center staff. CNYPC is an OMH</p> <p>21 psychiatric center.</p> <p>22 BY MS. KALKACH:</p> <p>23 Q Okay. How is it decided when an inmate should be</p> <p>24 assigned to a specific correctional facility?</p> <p>25 A There are different factors that are considered,</p>  | <p>Page 36</p> <p>1 BY MS. KALKACH:</p> <p>2 Q I understand.</p> <p>3 Are there any guidelines for a therapist to know</p> <p>4 when to assign these in-between sessions?</p> <p>5 A They're asked to consider circumstances and,</p> <p>6 again, clinical judgment.</p> <p>7 Q Okay. Are you familiar with the screening that</p> <p>8 is done to the inmates?</p> <p>9 MS. COWAN: Objection.</p> <p>10 A Which screening?</p> <p>11 BY MS. KALKACH:</p> <p>12 Q The initial screening.</p> <p>13 A Yes.</p> <p>14 Q What could be the consequences of the screening?</p> <p>15 MS. COWAN: Objection.</p> <p>16 A The screening is looking for individuals who</p> <p>17 might need mental health services.</p> <p>18 So some individuals wind up being determined to</p> <p>19 not need any, and they won't be opened to services, others</p> <p>20 will be, or sometimes additional information is needed.</p> <p>21 BY MS. KALKACH:</p> <p>22 Q Would the screening affect the supervision and</p> <p>23 treatment that an inmate may receive?</p> <p>24 A The screening is used to determine who needs</p> <p>25 treatment.</p> |
| <p>Page 37</p> <p>1 and they're not all up to CNYPC. But if an individual is</p> <p>2 admitted to caseload, the clinician will decide what level</p> <p>3 of services is appropriate, and that will be one of the</p> <p>4 considerations in terms of which facility they then go to.</p> <p>5 The Department of Corrections has other</p> <p>6 considerations for which facility they should go to.</p> <p>7 Q When do they see the clinician?</p> <p>8 A When do they see the clinician?</p> <p>9 Q Yes.</p> <p>10 A They need to see --</p> <p>11 Depending what kinds of services they're getting,</p> <p>12 but in general population they would be expected to see the</p> <p>13 psychiatrist minimally every 90 days and primary therapist</p> <p>14 monthly, and there's flexibility left for additional</p> <p>15 in-between sessions left to clinical judgment.</p> <p>16 Q When would an in-between session happen?</p> <p>17 Why would it happen?</p> <p>18 MS. COWAN: Objection.</p> <p>19 A Hypotheticals, if the clinician and patient were</p> <p>20 trying to change something, and they thought an in-between</p> <p>21 session made sense. If there was some increased level of</p> <p>22 concern, they might see them more frequently. If a patient</p> <p>23 had an issue, they might be seen sooner.</p> <p>24 It would depend.</p> <p>25</p> | <p>Page 39</p> <p>1 Q So would it affect the supervision and treatment</p> <p>2 that an inmate may receive?</p> <p>3 Yes or no?</p> <p>4 MS. COWAN: Objection.</p> <p>5 A Yes.</p> <p>6 BY MS. KALKACH:</p> <p>7 Q Who's in charge of prescribing medication to</p> <p>8 inmates?</p> <p>9 A Psychotropic medications or medications in</p> <p>10 general?</p> <p>11 Q Medications in general.</p> <p>12 A Then that depends.</p> <p>13 If it's related to psychiatric treatment, it</p> <p>14 would be a psychiatrist or nurse practitioner working for</p> <p>15 Central New York Psychiatric Center.</p> <p>16 If it's for general medical treatment, then</p> <p>17 that's the purview of the DOCCS Medical.</p> <p>18 Q How many times does an inmate see a medical</p> <p>19 doctor that could prescribe medication?</p> <p>20 A I'm sorry. For psychiatric treatment or medical</p> <p>21 treatment?</p> <p>22 Q For both. Let's separate it.</p> <p>23 How many times does an inmate see a medical</p> <p>24 doctor for psychiatric treatment that could prescribe</p> <p>25 medication?</p>                                 |



|   |   |
|---|---|
| <p>Page 40</p> <p>1 A If they're taking medication, the minimum is once<br/>2 every 90 days.</p> <p>3 Q And how many times does an inmate see a medical<br/>4 doctor that could prescribe medication, the regular one?</p> <p>5 MS. COWAN: Objection.</p> <p>6 A They can request a call-out. I can't speak to<br/>7 DOCCS medical policy.</p> <p>8 BY MS. KALKACH:</p> <p>9 Q How often does an inmate see his or her social<br/>10 worker?</p> <p>11 MS. COWAN: Objection.</p> <p>12 A You mean the primary therapist?</p> <p>13 BY MS. KALKACH:</p> <p>14 Q Yes.</p> <p>15 A They need to see that person monthly.</p> <p>16 Q Is there a policy that specifies how often should<br/>17 an inmate see his or her social worker?</p> <p>18 A I'm sure there is.</p> <p>19 Q Is there a policy that specifies how often should<br/>20 an inmate see his or her medical doctor?</p> <p>21 MS. COWAN: Objection.</p> <p>22 A Medical doctors in DOCCS medical-medical doctor<br/>23 or if a medical doctor as an MD psychiatrist?</p> <p>24 BY MS. KALKACH:</p> <p>25 Q Both.</p>  | <p>Page 42</p> <p>1 Within Central New York Psychiatric Center, they<br/>2 have supervisors who work with clinicians. There are<br/>3 outside entities that review for following policies, the<br/>4 Justice Center, the Commission on Correction.</p> <p>5 BY MS. KALKACH:</p> <p>6 Q What are the consequences of not following a<br/>7 policy?</p> <p>8 MS. COWAN: Objection.</p> <p>9 A It depends.</p> <p>10 BY MS. KALKACH:</p> <p>11 Q I'm going to make it more specific.<br/>12 What are the consequences of a correctional<br/>13 facility that does not follow a policy?</p> <p>14 MS. COWAN: Objection.</p> <p>15 A I don't understand.</p> <p>16 BY MS. KALKACH:</p> <p>17 Q So if a correctional facility is not following a<br/>18 policy, what would be the consequences of this?</p> <p>19 MS. COWAN: Objection.</p> <p>20 A I don't --<br/>21 I don't think we think of a facility not<br/>22 following a policy.<br/>23 Do you mean a staff person not following a<br/>24 policy?<br/>25</p>   |
| <p>Page 41</p> <p>1 A So, again, I don't -- I can't speak to another<br/>2 agency's policies for medical practices.<br/>3 For medication management, it's once every 90<br/>4 days.</p> <p>5 Q If an inmate requests to see a doctor, how<br/>6 quickly should they be addressed?</p> <p>7 MS. COWAN: Objection.</p> <p>8 A I don't remember what the CYNPC policy is on how<br/>9 quickly they respond to it.</p> <p>10 BY MS. KALKACH:</p> <p>11 Q Is there a policy that states so?</p> <p>12 A If they --<br/>13 States what though?</p> <p>14 I'm sorry. Can you reframe your question?</p> <p>15 Q Yes, I can.<br/>16 If an inmate requests to see a doctor, is there a<br/>17 policy that states how quickly they should be addressed?</p> <p>18 MS. COWAN: Objection.</p> <p>19 A I don't know what the actual policy would be on<br/>20 that.</p> <p>21 BY MS. KALKACH:</p> <p>22 Q In general who or what organization oversees that<br/>23 all mental health policies are followed?</p> <p>24 MS. COWAN: Objection.</p> <p>25 A There's multiple layers of review.</p> | <p>Page 43</p> <p>1 BY MS. KALKACH:</p> <p>2 Q Yes.</p> <p>3 A It depends on in what way the policy wasn't<br/>4 followed or what that policy was, what the consequences of<br/>5 not following a policy were.</p> <p>6 Q Are there --<br/>7 Scratch that.</p> <p>8 Is there audits or a system that is followed to<br/>9 have correctional facilities in check with their policy<br/>10 compliance?</p> <p>11 A Yes, there is accreditation on the correctional<br/>12 side. We have direct commission accreditation. Internal<br/>13 CNYPC has their own mechanism for reviewing quality of care.</p> <p>14 Q What is the name of this mechanism?</p> <p>15 A The mechanism?<br/>16 I don't know what you mean.</p> <p>17 Q Scratch that.<br/>18 How does the accreditation work?</p> <p>19 MS. COWAN: Objection.</p> <p>20 A Accreditation?</p> <p>21 BY MS. KALKACH:</p> <p>22 Q Yes.</p> <p>23 A Joint Commission on Accreditation is around every<br/>24 three years. The Joint Commission will come into the<br/>25 facility, Central New York Psychiatric Center, and while</p> |

|  |  |
|--|--|
| <p>Page 44</p> <p>1 they are accrediting CNYPC, they will also visit some of the</p> <p>2 correctional locations for CNYPC.</p> <p>3 While they're there they will look at</p> <p>4 documentation. They will talk to staff. They will ask</p> <p>5 questions. They will look at the environment of care.</p> <p>6 Q So you said they go to some of the correctional</p> <p>7 facilities.</p> <p>8 How do they choose which facilities to go to?</p> <p>9 MS. COWAN: Objection.</p> <p>10 A I don't know. I have no idea.</p> <p>11 BY MS. KALKACH:</p> <p>12 Q Are there any sanctions that should be put in</p> <p>13 place when a correctional facility does not follow the</p> <p>14 policies?</p> <p>15 MS. COWAN: Objection.</p> <p>16 A I don't understand what you're asking.</p> <p>17 BY MS. KALKACH:</p> <p>18 Q So after they do the audit and they look at the</p> <p>19 documentation and everything, if a correctional facility is</p> <p>20 not complying with the policies, is there any sanction that</p> <p>21 they get?</p> <p>22 A You're asking about accreditation?</p> <p>23 Q Yes.</p> <p>24 A When the Joint Commission has completed the</p> <p>25 review, they will tell the facility -- by this I mean</p> | <p>Page 46</p> <p>1 BY MS. KALKACH:</p> <p>2 Q I'm sorry. What was your answer?</p> <p>3 A It depends.</p> <p>4 Q What does it depend on?</p> <p>5 A It could depend on if there's a review of a</p> <p>6 negative outcome. If they identify a problem and they</p> <p>7 wanted to change their policy, they might update it then.</p> <p>8 If they decided to improve their suicide risk assessment,</p> <p>9 they might update it then as well.</p> <p>10 It might not be linked to a specific problem. If</p> <p>11 there's a change in requirement somewhere else from the</p> <p>12 Joint Commission or something like that, they might update</p> <p>13 it then as well.</p> <p>14 Q Do you know who is in charge of updating these</p> <p>15 policies?</p> <p>16 A The CYNPC has their process for updating their</p> <p>17 policies.</p> <p>18 I'm not involved in their day-to-day work on</p> <p>19 updating policies.</p> <p>20 Q So you don't know the process from beginning to</p> <p>21 end on how to update the policies for CYNPC?</p> <p>22 A I do not.</p> <p>23 Q Okay. Do you know how they get distributed?</p> <p>24 A I know they get distributed. I don't get</p> <p>25 involved in how they distribute, so no.</p> |
| <p>Page 45</p> <p>1 Central New York Psychiatric Center -- what their findings</p> <p>2 are and if there needs to be a corrective action plan or</p> <p>3 not. That's up to the Joint Commission.</p> <p>4 It's theoretically possible that a location could</p> <p>5 lose accreditation. That hasn't happened.</p> <p>6 Q Could you please repeat that last?</p> <p>7 A That hasn't happened.</p> <p>8 Q Before that.</p> <p>9 A It's theoretically possible to lose</p> <p>10 accreditation.</p> <p>11 They're not accredited by individual correctional</p> <p>12 facility. Their accreditation is for Central New York.</p> <p>13 Q Are there any policies regarding inmates that</p> <p>14 have attempted to commit suicide?</p> <p>15 MS. COWAN: Objection.</p> <p>16 A There are policies around suicide, risk</p> <p>17 assessment, policies for different units.</p> <p>18 BY MS. KALKACH:</p> <p>19 Q Who drafted these policies?</p> <p>20 A Those would have been drafted by Central New York</p> <p>21 Psychiatric Center.</p> <p>22 Q Who oversees these policies are followed?</p> <p>23 A CNYPC.</p> <p>24 Q How often do the policies get updated?</p> <p>25 MS. COWAN: Objection.</p>                                | <p>Page 47</p> <p>1 Q Is there a policy about how to deal with an</p> <p>2 inmate with a mental illness?</p> <p>3 MS. COWAN: Objection.</p> <p>4 A I'm not sure how to answer that question, how to</p> <p>5 deal with an inmate with a mental illness.</p> <p>6 BY MS. KALKACH:</p> <p>7 Q Yes. Let me try to rephrase that one.</p> <p>8 Is there a policy about how to treat an inmate</p> <p>9 with a mental illness?</p> <p>10 MS. COWAN: Objection.</p> <p>11 A Treatment isn't dictated through policy.</p> <p>12 Treatment is guided by clinical judgment, clinical practice.</p> <p>13 BY MS. KALKACH:</p> <p>14 Q When I say "treat," I don't mean it as treatment</p> <p>15 like medical treatment, but more about how they conduct all</p> <p>16 the actions that you must take when an inmate has a mental</p> <p>17 illness.</p> <p>18 MS. COWAN: Objection.</p> <p>19 A Policies are structural. They talk about</p> <p>20 documentation and program structure. They don't tell a</p> <p>21 clinician how to treat someone.</p> <p>22 BY MS. KALKACH:</p> <p>23 Q Again, I'm not talking about treatment. Please</p> <p>24 scratch that.</p> <p>25 Is there a process to report an inmate when they</p>                       |

|   |  |
|---|--|
| <p>1 speak about suicide?</p> <p>2 MS. COWAN: Objection.</p> <p>3 A When an inmate says they feel suicidal, is there</p> <p>4 a process to report it?</p> <p>5 Is that what you're asking?</p> <p>6 BY MS. KALKACH:</p> <p>7 Q Yes.</p> <p>8 A There is an expectation that an inmate who</p> <p>9 reports suicidal ideation is assessed, and then the</p> <p>10 clinician takes appropriate steps.</p> <p>11 Q So if there's an inmate that has been speaking</p> <p>12 about suicide, which people in a correctional facility would</p> <p>13 need to be aware of it?</p> <p>14 MS. COWAN: Objection.</p> <p>15 A In general, if there's an individual who is</p> <p>16 reporting suicidal ideation, then we would want the mental</p> <p>17 health unit made aware so that the individual could be</p> <p>18 assessed, and they could make a determination about the</p> <p>19 circumstances and individually assess that person to</p> <p>20 determine what's appropriate.</p> <p>21 BY MS. KALKACH:</p> <p>22 Q And how would mental health be made aware --</p> <p>23 Okay, scratch that.</p> <p>24 Who are the people in a correctional facility</p> <p>25 that would need to be aware of the process?</p>                         | <p>Page 48</p> <p>1 BY MS. KALKACH:</p> <p>2 Q Is there a specific area within the correctional</p> <p>3 facility where people with mental illness should be?</p> <p>4 MS. COWAN: Objection.</p> <p>5 A There are different levels of treatment, so it</p> <p>6 depends on the clinical assessment of their needs.</p> <p>7 BY MS. KALKACH:</p> <p>8 Q Okay. What are these different levels of</p> <p>9 treatment?</p> <p>10 A They are similar to the community structure of</p> <p>11 treatment. So in the community outside of prisons, just</p> <p>12 because a person has a mental illness doesn't mean by itself</p> <p>13 where they should or shouldn't be.</p> <p>14 So within a correctional facility, some</p> <p>15 individuals who need mental health treatment, but only need</p> <p>16 clinic-level services can stay in general population and</p> <p>17 come to the mental health unit for their appointments.</p> <p>18 Some individuals may live in a more structured</p> <p>19 unit intended for individuals with serious mental illness</p> <p>20 who need more support, and some may need inpatient-level</p> <p>21 treatment, so they would go to CYNPC.</p> <p>22 There's an assortment of programs trying to</p> <p>23 provide a spectrum of services.</p> <p>24 Q Should people that have tried to commit suicide</p> <p>25 inside a correctional get any special attention or care?</p> <p>Page 50</p>                       |
| <p>1 MS. COWAN: Objection.</p> <p>2 A What happened --</p> <p>3 BY MS. KALKACH:</p> <p>4 Q Of the process to report, yes.</p> <p>5 A I think staff and correctional facilities on the</p> <p>6 correctional side or on the mental health side are aware</p> <p>7 that if an inmate reports suicidal ideation that it needs to</p> <p>8 be communicated to the mental health unit.</p> <p>9 Q How are all of these people that you mentioned</p> <p>10 made aware of the process?</p> <p>11 A I don't know. I'm not responsible for training</p> <p>12 any of them. They're their own policies.</p> <p>13 Q Is there a policy that contains any guidance</p> <p>14 regarding special treatment inside the correctional?</p> <p>15 MS. COWAN: Objection.</p> <p>16 A What do you mean by "special treatment"?</p> <p>17 BY MS. KALKACH:</p> <p>18 Q Special treatment to people -- inmates with</p> <p>19 mental illness.</p> <p>20 MS. COWAN: Objection.</p> <p>21 A There are policies about the programs that are</p> <p>22 established where they can be or can't be within a</p> <p>23 correctional facility, what happens in disciplinary.</p> <p>24 There are policies, but I'm not sure what you</p> <p>25 mean.</p> <p>Page 49</p> | <p>1 MS. COWAN: Objection.</p> <p>2 A If a person has attempted suicide in the past,</p> <p>3 that's important information, but what kind of care they</p> <p>4 need currently is going to depend on a number of different</p> <p>5 factors besides what's happened in the past.</p> <p>6 BY MS. KALKACH:</p> <p>7 Q Which ones are these factors?</p> <p>8 A Current circumstances, their symptoms, the</p> <p>9 overall clinical presentation, how their presentation is</p> <p>10 understood, what the different contributing issues might be.</p> <p>11 Individuals who have committed suicide, their</p> <p>12 clinical presentation and assessment will change over time.</p> <p>13 There's not an automatic assumption that once you've</p> <p>14 committed suicide that there's anything -- that you're</p> <p>15 permanently placed in any particular location.</p> <p>16 Just like in the community, there are individuals</p> <p>17 who have committed suicide, but they return home and go</p> <p>18 about their daily lives again.</p> <p>19 Q According to the policies, would an inmate be</p> <p>20 allowed to have his shoelaces after he had attempted suicide</p> <p>21 with them in the past?</p> <p>22 MS. COWAN: Objection.</p> <p>23 A So it depends if they had acute risk and were</p> <p>24 currently in crisis and admitted to the crisis unit.</p> <p>25 Maybe not but, if not and they're more stable or</p> <p>Page 51</p> |



|   |   |
|---|---|
| <p>Page 52</p> <p>1 living in general population, people get their shoelaces</p> <p>2 back.</p> <p>3 BY MS. KALKACH:</p> <p>4 Q Who makes this decision?</p> <p>5 A The treatment team makes these decisions.</p> <p>6 Q After a suicide attempt, should an inmate be</p> <p>7 reevaluated?</p> <p>8 A Reassessed after something as serious as a</p> <p>9 suicide attempt, yes.</p> <p>10 Q After a suicide attempt, should an inmate be</p> <p>11 screened again to know where he's supposed to be to receive</p> <p>12 adequate supervision and treatment?</p> <p>13 MS. COWAN: Objection.</p> <p>14 A Part of the assessment is deciding what kind of</p> <p>15 treatment they need.</p> <p>16 BY MS. KALKACH:</p> <p>17 Q Are you familiar with Special Housing Unit?</p> <p>18 A Yes.</p> <p>19 Q Is there any reason to send an inmate to a</p> <p>20 Special Housing Unit?</p> <p>21 MS. COWAN: Objection.</p> <p>22 A Special Housing Units are run by the Department</p> <p>23 of Corrections. They make those decisions about who goes.</p> <p>24 BY MS. KALKACH:</p> <p>25 Q Do you know the reasons for sending an inmate to</p> | <p>Page 54</p> <p>1 A No, I do not.</p> <p>2 Q Do you know what suicide watch is?</p> <p>3 A Yes.</p> <p>4 Q When is an inmate placed on suicide watch?</p> <p>5 A When there is concern about an inmate's suicide</p> <p>6 potential for some reason, there can be a decision to put</p> <p>7 them on watch until it can be assessed.</p> <p>8 Q Are there any standard items that an inmate</p> <p>9 should have when he's put in suicide watch?</p> <p>10 MS. COWAN: Objection.</p> <p>11 A Standard items of --</p> <p>12 There are --</p> <p>13 There can be decisions about what they can't</p> <p>14 have.</p> <p>15 BY MS. KALKACH:</p> <p>16 Q Who makes these decisions?</p> <p>17 A It depends.</p> <p>18 Q On what?</p> <p>19 A The Department of Corrections DOCCS staff can</p> <p>20 initiate watches if it's off-hours. But if someone goes</p> <p>21 into the RCTP, the mental health treatment team would decide</p> <p>22 what's appropriate or not appropriate in terms of</p> <p>23 restrictions.</p> <p>24 Q Do you know what a parole board hearing is?</p> <p>25 A No, that I don't.</p>  |
| <p>Page 53</p> <p>1 Special Housing Unit?</p> <p>2 A It's related to an individual sustaining an</p> <p>3 infraction.</p> <p>4 Q What do you mean by that?</p> <p>5 A Breaking one of the rules within the Department</p> <p>6 of Corrections, they decide -- security decides what the</p> <p>7 appropriate action is. Sometimes they decide to send</p> <p>8 someone to the Special Housing Unit.</p> <p>9 Q So it would be only something related to an</p> <p>10 infraction in order to be sent to a Special Housing Unit?</p> <p>11 A To go to Special --</p> <p>12 Yes.</p> <p>13 Q Do you know what a suicide watch commander is?</p> <p>14 MS. COWAN: Objection.</p> <p>15 A That's on the correctional side. I'm aware of</p> <p>16 the term.</p> <p>17 BY MS. KALKACH:</p> <p>18 Q You are aware of the term, or no?</p> <p>19 A Yes.</p> <p>20 Q Do you know who has this position?</p> <p>21 A No, I don't.</p> <p>22 Q Do you know what this person's duties are?</p> <p>23 A They work with the mental health team on those on</p> <p>24 suicide watch.</p> <p>25 Q Do you know who appoints this person?</p>                   | <p>Page 55</p> <p>1 Q Is there a policy on suicide prevention?</p> <p>2 A There's a policy on suicide risk assessment.</p> <p>3 Q Who drafted this policy?</p> <p>4 A It's a CNYPC policy.</p> <p>5 Q Who oversees that the policy is followed?</p> <p>6 A Also CNYPC.</p> <p>7 Q Who knows how often the policy gets updated?</p> <p>8 A That would depend on different things, like if</p> <p>9 there's a change -- change in environments or they've</p> <p>10 decided to change their own practice to try to improve what</p> <p>11 they're doing. It depends.</p> <p>12 Q If this policy, suicide risk assessment, is not</p> <p>13 being followed, is there an organization within OMH that</p> <p>14 follows up on the correctional facilities complying with it?</p> <p>15 A Organization within Office of Mental Health</p> <p>16 that --</p> <p>17 CYNPC has an incident review process, and they</p> <p>18 determined if policies are not followed. They also decide</p> <p>19 what kind of intervention is appropriate.</p> <p>20 Q Which kind of intervention do they have?</p> <p>21 A It depends. Sometimes it might be retraining.</p> <p>22 In other circumstances it might be other kinds of individual</p> <p>23 supervision.</p> <p>24 Q Are there more, or those are the only</p> <p>25 interventions?</p> |

|  |         |   |         |
|--|---------|---|---------|
| <p>1 A I'm sure there are others, and I think it would<br/>2 depend.<br/>3 Q Who is in charge of the incident review process?<br/>4 A At the facility level, they have their process,<br/>5 and their administration supervisors are involved in this<br/>6 review process.<br/>7 Q Who decides the kind of intervention that would<br/>8 apply to the specific case?<br/>9 A CNYPC administration and the supervisor that's<br/>10 appropriate, depending on what the staff person's discipline<br/>11 was, would decide.<br/>12 Q Are there training or education on suicide<br/>13 prevention?<br/>14 A There are, yes.<br/>15 Q Who receives it?<br/>16 A There might be some variation in the exact<br/>17 audience, but they provide training to all of their staff.<br/>18 There's also training to the Department of<br/>19 Corrections staff.<br/>20 Q How often do they receive it?<br/>21 A New staff receive it. I believe it's annually<br/>22 given to the Department of Corrections. Mental health<br/>23 staff, they have different trainings at different points.<br/>24 Q Okay. So for a training that is annually, when<br/>25 is this given?</p> | Page 56 | <p>1 Q Okay. What are the positions of the people that<br/>2 draft the policies?<br/>3 A I don't know which specific people get involved<br/>4 in each policy. But in general policy development, they<br/>5 have an administrative and supervisory structure who would<br/>6 be involved in some of the revisions, or at least reviewing<br/>7 them.<br/>8 Q Who oversees that the policy is followed?<br/>9 A CNYPC has a supervisory structure, and they<br/>10 ensure that their policies are followed.<br/>11 Q So evaluation for suicide risk, the policies that<br/>12 contain this official evaluation, who oversees that this<br/>13 policy is followed?<br/>14 MS. COWAN: Objection.<br/>15 A I feel like you're asking for a specific person.<br/>16 Is that what you're asking?<br/>17 BY MS. KALKACH:<br/>18 Q No. I'm asking for either a department or a team<br/>19 or something else.<br/>20 A Clinical supervision, and there's a structure for<br/>21 that.<br/>22 Q How often do the evaluations for suicide risk<br/>23 should be made?<br/>24 A When somebody comes off of services, they get<br/>25 reassessed or the packet is reviewed, potential risks redone</p> | Page 58 |
| <p>1 A I don't know when they do that.<br/>2 Q Do you know who provides it?<br/>3 A There's joint training between the Department of<br/>4 Corrections and OMH and CNYPC.<br/>5 Q And who pays for the training?<br/>6 A Who pays for it?<br/>7 Q Mm-hmm.<br/>8 A I suppose both, staff time.<br/>9 Q How long does a training last?<br/>10 A I don't know that off the top of my head.<br/>11 Q Is there a policy that speaks about official<br/>12 evaluations for suicide risk?<br/>13 A They have an official suicide risk assessment<br/>14 tool, yes.<br/>15 Q Do you know which policy is the one that has this<br/>16 official evaluation?<br/>17 A The policies are numbered, and I don't remember.<br/>18 Q Do you know who drafted this policy?<br/>19 A I don't know which specific person drafted it,<br/>20 no.<br/>21 Q Do you know which position would this person<br/>22 have -- the person that drafted the policy have?<br/>23 A My understanding is that their policies are<br/>24 drafted jointly. It's not one single person who's writing<br/>25 all of these.</p>   | Page 57 | <p>1 and transferred to pending.<br/>2 It needs to be redone if the circumstances change<br/>3 or if they've been admitted to the inpatient and are<br/>4 returning to the facility. They need to be redone.<br/>5 Q What is a risk factor?<br/>6 MS. COWAN: Objection.<br/>7 A I'm sorry. I talked over you and didn't hear<br/>8 what you said.<br/>9 BY MS. KALKACH:<br/>10 Q What is a risk factor according with the<br/>11 policies?<br/>12 A A risk factor is something that increases a<br/>13 person's chances of some sort of outcome that you're trying<br/>14 to avoid.<br/>15 Q Is there a list of risk factors?<br/>16 A There's a list of risk factors in CNYPC's risk<br/>17 assessment tool.<br/>18 Q Do you know what the list is?<br/>19 A I've seen the list. There's a lot of them. It's<br/>20 a combination of historical risk factors, clinical risk<br/>21 factors, acute stressors.<br/>22 Q Okay. So how is the evaluation for suicide risk<br/>23 performed?<br/>24 A It's partly based on the clinical assessment, the<br/>25 interview with the individual, what they have to say, but it</p>   | Page 59 |

|  |  |
|--|--|
| <p>Page 60</p> <p>1 also takes into account historical information.</p> <p>2 So it's both of those things that provide the</p> <p>3 foundation for the information used to fill out the suicide</p> <p>4 risk assessment.</p> <p>5 Q Who performs the evaluation?</p> <p>6 A The primary therapist who is doing the</p> <p>7 assessment.</p> <p>8 Q Are the people performing the evaluation trained?</p> <p>9 A Yes.</p> <p>10 Q How often?</p> <p>11 A I don't know how often exactly that they're</p> <p>12 trained.</p> <p>13 Q How long are the trainings?</p> <p>14 A I've never delivered one of the trainings. I do</p> <p>15 not know how long they are.</p> <p>16 Q Who would receive the training?</p> <p>17 A Mental health staff at the units.</p> <p>18 Q Are you aware of any other suicides that happened</p> <p>19 in the Mid-State Correctional Facility during 2013 to 2018?</p> <p>20 A There might be. I did not go back and look at</p> <p>21 that specifically for today.</p> <p>22 Q Are you aware of any changes to the policies and</p> <p>23 directives of Mid-State Correctional Facility as a</p> <p>24 consequence of other suicides during 2013 to 2018?</p> <p>25 MS. COWAN: Objection.</p>              | <p>Page 62</p> <p>1 get available information, talking to staff, talking to</p> <p>2 peers, reviewing the record.</p> <p>3 It's meant to determine if policies were</p> <p>4 followed, also meant to take a look at things clinically and</p> <p>5 try to understand why the suicide happened.</p> <p>6 Q Who needs to be notified after a suicide occurs?</p> <p>7 A Central Office and then the Justice Center,</p> <p>8 Commission on Corrections. The family is also notified if</p> <p>9 they haven't been notified already.</p> <p>10 Q Who gives the notifications?</p> <p>11 A CNYPC staff have their process for doing so.</p> <p>12 MS. KALKACH: Can I have just one minute please?</p> <p>13 Oh, never mind.</p> <p>14 MS. COWAN: Do you want to take like a</p> <p>15 five-minute break since we've been going for about two</p> <p>16 hours?</p> <p>17 MS. KALKACH: Yes, definitely, but I have three</p> <p>18 more questions, and then I want to review my notes so</p> <p>19 that we can take a break then.</p> <p>20 MS. COWAN: Okay, yeah.</p> <p>21 MS. KALKACH: Back on the record.</p> <p>22 BY MS. KALKACH:</p> <p>23 Q Was there anything different that should be</p> <p>24 changed to prevent these situations from happening?</p> <p>25 MS. COWAN: Objection.</p>  |
| <p>Page 61</p> <p>1 A I don't know that specifically.</p> <p>2 BY MS. KALKACH:</p> <p>3 Q Do you know if Mid-State Correctional Facility</p> <p>4 kept a suicide watch log?</p> <p>5 A I would have to guess that they did, but I did</p> <p>6 not see it. I don't know.</p> <p>7 Q In general, who has access to a facility suicide</p> <p>8 watch log?</p> <p>9 A I've never gotten involved in that question. I</p> <p>10 don't know the answer to it.</p> <p>11 Q Okay. Are there any policies about suicide?</p> <p>12 MS. COWAN: Objection.</p> <p>13 A Policies about suicide?</p> <p>14 There's policies, and some of them encompass</p> <p>15 suicide.</p> <p>16 BY MS. KALKACH:</p> <p>17 Q Do you know the name of them?</p> <p>18 A No, I don't know the specific name.</p> <p>19 Q What would be the procedure that needs to be</p> <p>20 taken after a person commits suicide?</p> <p>21 A After a suicide, the facility would make</p> <p>22 notifications. They notify Central Office. They notify the</p> <p>23 Justice Center. They notify the Commission on Corrections.</p> <p>24 They start the process of internal review, which includes</p> <p>25 communication with the Department of Corrections to try to</p> | <p>Page 63</p> <p>1 A That seems very broad.</p> <p>2 BY MS. KALKACH:</p> <p>3 Q I'm going to rephrase.</p> <p>4 In your opinion, is there anything different that</p> <p>5 should be changed to prevent suicides in</p> <p>6 correctional facilities from happening?</p> <p>7 A Suicides are often very individual, and</p> <p>8 individual circumstances are unique.</p> <p>9 So sometimes in looking at adverse events,</p> <p>10 including suicides, there are things that could have been</p> <p>11 decided differently sometimes in hindsight, but you couldn't</p> <p>12 have known it at the time, or there are opportunities for</p> <p>13 improved communication. Sometimes somebody knew something</p> <p>14 and didn't say anything. Sometimes a peer knew or family</p> <p>15 member knew.</p> <p>16 So there are lots of different examples, I</p> <p>17 suppose, where clinically somebody might try to learn --</p> <p>18 have lesson learned and try to respond to it, but it</p> <p>19 depends.</p> <p>20 In our look at suicides over the years, there</p> <p>21 haven't been overarching trends that connect them all</p> <p>22 together that would lead to one solution.</p> <p>23 MS. KALKACH: Okay. I will move to strike the</p> <p>24 portion not responsive.</p> <p>25 Now I would like to -- I would like to take a few</p> |

Page 64

1 minutes to review my notes and see what else, and then  
2 come back. So we can take a five-minute break.

3 MS. COWAN: Okay.

4 (Recess was taken.)

5 MS. KALKACH: I have no further questions. Thank  
6 you so much, Ms. Lee, for your time.

7 MS. COWAN: I don't have any questions. I just  
8 want to put on the record, though, that I'll have Dr.  
9 Lee read and sign.

10 Typically what I have done is, the person that  
11 notices the deposition pays for the transcript, so I  
12 wasn't sure what everyone else's practice was on that.  
13 That's what I've always practiced.

14 MS. NAPPI: That's exactly what we're going to do  
15 here and in the prior.


16 (Whereupon, the deposition was concluded at  
17 12:10 p.m.)  
18  
19  
20  
21  
22  
23  
24  
25

## 1 CERTIFICATE

2 I, Gina Williams, Registered Professional Court  
3 Reporter, do certify that the above deposition was reported  
4 by me and that the foregoing transcript is a true and  
5 accurate record to the best of my knowledge, skills, and  
6 ability.

7 I further certify that I am not an employee of  
8 counsel or any of the parties, nor a relative or employee of  
9 any attorney or counsel connected with the action, nor  
10 financially interested in the action.

11 Subscribed and sworn to before me when taken this  
12 17th day of June, 2022.

13  
14 

15 GINA WILLIAMS, RPR, CRR  
16  
17  
18  
19  
20  
21  
22  
23  
24  
25

## ACKNOWLEDGMENT OF DEPONENT

I, DR. LI-WEN LEE, do hereby certify that I have read the foregoing pages and that the same is a correct transcription of the answers given by me to the questions therein propounded, except for the corrections or changes in form or substance, if any, noted in the attached Errata Sheet.

---

DR. LI-WEN LEE

Date

Subscribed and sworn to before me this

\_\_\_ day of \_\_\_, 2022.

My commission expires:\_\_\_\_\_

---

Notary Public

1

- - - - -

2

## ERRATA

3

- - - - -

4

PAGE

LINE

CHANGE/REASON

5

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

6

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

7

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

8

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

9

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

10

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

11

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

12

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

13

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

14

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

15

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

16

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

17

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

18

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

19

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

20

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

21

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

22

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

23

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

24

\_\_\_\_\_

\_\_\_\_\_

\_\_\_\_\_

25

**WORD INDEX**

## &lt; 1 &gt;

10 9:13, 14 10:1, 5  
12:24 16:5  
10:06 1:19  
10001 4:21  
10016 2:6  
10th 2:5  
112 2:5  
12 26:7  
12:10 64:17  
13202 2:12  
15 25:24  
17 1:14, 18  
17th 65:12  
18 8:13  
1974 8:13  
1992 10:15  
1996 10:15, 21

## &lt; 2 &gt;

2 22:9  
20 26:8  
2000 10:21, 23  
2008 9:8 11:23, 24  
13:16 17:12  
2013 25:9 60:19, 24  
2018 9:23 25:20, 22,  
23 60:19, 24  
2019 12:4  
2022 1:14, 18 26:2  
65:12 66:15  
20-CV-01413 1:2  
21 3:8  
23 3:9

## &lt; 3 &gt;

300 2:11  
330 4:20  
365 25:19 26:1

## &lt; 4 &gt;

4 3:4

## &lt; 6 &gt;

6 25:25

## &lt; 8 &gt;

8 25:19, 25

## &lt; 9 &gt;

90 37:13 40:2 41:3  
9th 4:21

## &lt; A &gt;

a.m 1:19  
ability 5:18 65:6  
able 15:10  
above-styled 1:18  
access 26:9 34:1  
61:7  
accommodate 6:10  
account 60:1  
accreditation 16:5  
30:4 43:11, 12, 18, 20,  
23 44:22 45:5, 10, 12  
accredited 45:11  
accrediting 44:1  
accuracy 28:12  
accurate 65:5  
accurately 25:14  
ACKNOWLEDGMEN  
T 66:1  
ACTION 1:2 45:2  
53:7 65:9, 10  
actions 47:16  
actual 41:19  
acute 51:23 59:21  
ad 1:5  
additional 37:14  
38:20  
address 4:11, 12, 19  
addressed 41:6, 17  
adequate 52:12  
admin 34:9  
administrates 31:9  
administration 18:8  
30:2, 18 35:13 56:5,  
9  
administrative 58:5  
Administrator 1:4  
admitted 37:2 51:24  
59:3  
Adult 17:24  
adverse 63:9  
affect 5:17 7:14  
38:22 39:1  
age 25:4

agency 14:22 15:1  
28:4  
agency's 41:2  
ago 10:5 20:18 33:8  
AIMEE 2:12 7:19  
24:12  
al 1:5  
Albert 11:13  
alcohol 7:14  
allowed 51:20  
Amended 3:8, 9  
amount 32:20  
Amy 1:5  
Ann 14:15, 16  
annually 56:21, 24  
Answer 3:9 5:24  
6:1, 17 21:10 32:24  
33:12 46:2 47:4  
61:10  
answered 6:12  
answers 6:2 31:13  
66:5  
anybody 20:1  
apparently 15:19  
appearing 2:2  
Apple 6:20  
apply 56:8  
appointments 50:17  
appoints 53:25  
approach 30:18  
34:14  
appropriate 37:3  
48:10, 20 53:7 54:22  
55:19 56:10  
approval 28:7  
approves 28:5  
approximate 25:20  
26:5  
approximately 26:3  
approximation 9:20  
area 29:14 50:2  
areas 18:2 26:15  
Article 9:13, 14 10:1  
12:24 16:5  
asked 20:4, 17 38:5  
asking 22:19 36:15  
44:16, 22 48:5 58:15,  
16, 18  
assess 48:19

assessed 48:9, 18  
54:7  
assessment 7:24  
45:17 46:8 50:6  
51:12 52:14 55:2, 12  
57:13 59:17, 24 60:4,  
7  
assign 38:4  
assigned 35:20 36:1,  
24  
assist 13:11  
associate 12:5 13:19,  
25 14:3  
assortment 50:22  
assume 5:25 35:3  
assumption 51:13  
attached 66:7  
attempt 52:6, 9, 10  
attempted 19:22  
45:14 51:2, 20  
attend 10:10  
attending 11:22  
attention 50:25  
ATTORNEY 2:10  
6:16 20:10 21:10  
65:9  
attorneys 2:2 24:8  
audience 56:17  
audit 44:18  
audits 43:8  
automatic 51:13  
autopsy 7:21  
available 62:1  
Avenue 2:5 4:21  
avoid 59:14  
aware 8:25 16:9, 11  
19:16, 19, 22 27:14  
35:14, 17, 23 48:13,  
17, 22, 25 49:6, 10  
53:15, 18 60:18, 22  
  
< B >  
back 9:5, 8 15:22  
35:5 52:2 60:20  
62:21 64:2  
based 6:1 59:24  
basic 24:23 25:3  
basis 15:3 26:13, 17  
33:9



|  |   |  |  |
|--|---|--|--|
| <b>Beginning</b> 12:4<br>28:10 29:21, 23<br>35:11 46:20<br><b>behalf</b> 2:4, 9<br><b>believe</b> 23:3 25:9<br>56:21<br><b>Bellevue</b> 11:20, 24<br><b>best</b> 6:6 65:5<br><b>Beth</b> 11:11<br><b>better</b> 23:12, 13<br>29:16<br><b>beyond</b> 19:3<br><b>bit</b> 24:23 29:2 35:5<br><b>board</b> 54:24<br><b>born</b> 8:12, 14<br><b>Branch</b> 11:3<br><b>break</b> 6:9, 13 62:15,<br>19 64:2<br><b>Breaking</b> 53:5<br><b>brief</b> 17:1<br><b>briefly</b> 11:18<br><b>broad</b> 13:7 63:1<br><b>Bronx</b> 11:14<br><b>bureaus</b> 18:19<br><b>business</b> 4:12<br><br>< C ><br><b>called</b> 4:3 18:18<br><b>call-out</b> 40:6<br><b>capacity</b> 36:10<br><b>caption</b> 5:10<br><b>Captioner</b> 1:21<br><b>care</b> 29:4, 6 43:13<br>44:5 50:25 51:3<br><b>case</b> 5:6, 10 7:20<br>16:7 19:10, 12, 13<br>56:8<br><b>caseload</b> 37:2<br><b>cause</b> 1:18<br><b>cell</b> 6:20<br><b>Center</b> 11:12, 21<br>16:22 28:3 33:24<br>34:1 36:20, 21 39:15<br>42:1, 4 43:25 45:1,<br>21 61:23 62:7<br><b>Centers</b> 12:12 18:4,<br>6 29:4 30:1 34:7<br><b>central</b> 13:11 16:22<br>17:21 24:19 26:17,<br>21 27:7, 17 28:3 | 34:14 35:13 36:20<br>39:15 42:1 43:25<br>45:1, 12, 20 61:22<br>62:7<br><b>certain</b> 13:13<br><b>CERTIFICATE</b> 65:1<br><b>certification</b> 11:16<br><b>Certified</b> 1:20, 21<br><b>certify</b> 65:3, 7 66:3<br><b>cetera</b> 6:21<br><b>chances</b> 59:13<br><b>change</b> 26:15 28:15,<br>18, 19, 23, 24, 25 29:1<br>30:8, 9 37:20 46:7,<br>11 51:12 55:9, 10<br>59:2<br><b>CHANGE/REASON</b><br>67:4<br><b>changed</b> 30:5 62:24<br>63:5<br><b>changes</b> 60:22 66:6<br><b>charge</b> 29:19 30:21<br>31:4, 8, 15, 16, 19<br>39:7 46:14 56:3<br><b>check</b> 36:2 43:9<br><b>Chemical</b> 10:17<br><b>CHEVERIE</b> 2:5<br><b>chief</b> 11:23 27:9<br><b>Children's</b> 17:24<br><b>choose</b> 44:8<br><b>circumstances</b> 38:5<br>48:19 51:8 55:22<br>59:2 63:8<br><b>City</b> 4:20 11:12<br><b>CIVIL</b> 1:2 17:25<br><b>CLARITY</b> 2:20<br><b>clinical</b> 13:10 27:9<br>30:25 37:15 38:6<br>47:12 50:6 51:9, 12<br>58:20 59:20, 24<br><b>clinically</b> 62:4 63:17<br><b>clinician</b> 9:8 37:2, 7,<br>8, 19 47:21 48:10<br><b>clinicians</b> 42:2<br><b>clinic-level</b> 50:16<br><b>close</b> 6:23<br><b>CNYPC</b> 7:21, 25<br>36:20 37:1 43:13<br>44:1, 2 45:23 55:4, 6 | 56:9 57:4 58:9<br>62:11<br><b>CNYPC's</b> 59:16<br><b>college</b> 10:10 11:13<br><b>combination</b> 18:25<br>30:23 59:20<br><b>come</b> 11:24 20:4<br>22:7 43:24 50:17<br>64:2<br><b>comes</b> 26:24 58:24<br><b>coming</b> 13:6<br><b>commander</b> 53:13<br><b>commencing</b> 1:18<br><b>commission</b> 28:18<br>30:4 42:4 43:12, 23,<br>24 44:24 45:3 46:12<br>61:23 62:8 66:16<br><b>commissioner</b> 12:5<br>13:19, 25 14:3, 8, 9,<br>20, 21 20:9, 22, 23<br><b>commissioner's</b> 9:25<br><b>commit</b> 19:20, 23<br>45:14 50:24<br><b>commits</b> 61:20<br><b>committed</b> 19:16<br>51:11, 14, 17<br><b>communicated</b> 49:8<br><b>communication</b> 61:25<br>63:13<br><b>community</b> 17:22<br>36:18 50:10, 11<br>51:16<br><b>company</b> 34:17<br><b>Complaint</b> 3:8, 9<br>8:21<br><b>complaints</b> 8:23 22:7<br><b>completed</b> 11:11<br>44:24<br><b>compliance</b> 43:10<br><b>complicated</b> 18:19<br><b>complying</b> 44:20<br>55:14<br><b>components</b> 17:21<br><b>computers</b> 6:20<br><b>concern</b> 37:22 54:5<br><b>concluded</b> 64:16<br><b>conclusion</b> 26:24<br><b>conduct</b> 47:15<br><b>confused</b> 22:25 | <b>connect</b> 63:21<br><b>connected</b> 65:9<br><b>connecting</b> 20:10<br><b>consequence</b> 60:24<br><b>consequences</b> 38:14<br>42:6, 12, 18 43:4<br><b>consider</b> 38:5<br><b>considerations</b> 37:4, 6<br><b>considered</b> 25:7<br>36:25<br><b>consistent</b> 28:4, 19<br><b>contacted</b> 16:12<br><b>contain</b> 58:12<br><b>contains</b> 49:13<br><b>context</b> 20:3<br><b>continuing</b> 34:11<br><b>continuous</b> 34:14<br><b>continuously</b> 29:14<br><b>contributing</b> 51:10<br><b>control</b> 23:14<br><b>conversation</b> 15:4<br>16:3, 6 17:7, 10<br>20:22, 24 21:8<br><b>convicted</b> 8:10<br><b>coordinating</b> 13:4<br><b>correct</b> 21:20, 21<br>66:4<br><b>Correction</b> 42:4<br><b>correctional</b> 13:7<br>19:17 35:20 36:6, 12,<br>16, 24 42:12, 17 43:9,<br>11 44:2, 6, 13, 19<br>45:11 48:12, 24 49:5,<br>6, 14, 23 50:2, 14, 25<br>53:15 55:14 60:19,<br>23 61:3 63:6<br><b>correctional-based</b><br>12:23<br><b>Corrections</b> 27:12<br>36:9, 17 37:5 52:23<br>53:6 54:19 56:19, 22<br>57:4 61:23, 25 62:8<br>66:6<br><b>corrections-based</b><br>16:23 27:8<br><b>corrective</b> 45:2<br><b>counsel</b> 8:1, 3, 6<br>20:8, 14 24:12 65:8,<br>9 |
|--|---|--|--|

count 18:17  
 couple 19:23  
 COURT 1:1 6:3, 7  
 9:3 13:6 65:2  
 courtroom 5:15  
 covered 18:2  
 COWAN 2:12 4:12,  
 14 7:19 15:9, 15, 17,  
 20 17:19 18:24  
 19:11 20:14 21:9  
 23:18 27:16 32:23  
 35:8 36:14 37:18  
 38:9, 15 39:4 40:5,  
 11, 21 41:7, 18, 24  
 42:8, 14, 19 43:19  
 44:9, 15 45:15, 25  
 47:3, 10, 18 48:2, 14  
 49:1, 15, 20 50:4  
 51:1, 22 52:13, 21  
 53:14 54:10 58:14  
 59:6 60:25 61:12  
 62:14, 20, 25 64:3, 7  
 co-workers 20:12  
 creates 28:2, 3  
 creating 28:10  
 creation 28:11  
 crime 8:10  
 crisis 51:24  
 CRR 65:15  
 current 4:10 11:19  
 51:8  
 currently 51:4, 24  
 custody 12:21  
 CYNPC 41:8 46:16,  
 21 50:21 55:17

## &lt; D &gt;

daily 15:3 51:18  
 Darman 14:10  
 date 25:3 34:15  
 66:12  
 day 65:12 66:15  
 days 25:19 26:1  
 32:6 37:13 40:2  
 41:4  
 day-to-day 46:18  
 deal 47:1, 5  
 decide 30:14 31:22  
 37:2 53:6, 7 54:21  
 55:18 56:11

decided 30:6, 7 36:8,  
 23 46:8 55:10 63:11  
 decides 53:6 56:7  
 deciding 29:12 52:14  
 decision 52:4 54:6  
 decisions 9:14 29:10  
 52:5, 23 54:13, 16  
 defect 12:18  
 Defendant 1:5  
 Defendants 2:9  
 defined 33:15  
 definitely 62:17  
 degree 10:23  
 deliver 18:6  
 delivered 29:6 32:14  
 33:18 60:14  
 delivery 19:2  
 demographic 25:3  
 Department 27:12  
 30:21 31:4 34:9  
 36:9, 17 37:5 52:22  
 53:5 54:19 56:18, 22  
 57:3 58:18 61:25  
 depend 28:14 29:13  
 37:24 46:4, 5 51:4  
 55:8 56:2  
 depending 31:2 33:9  
 37:11 56:10  
 depends 26:19 39:12  
 42:9 43:3 46:3 50:6  
 51:23 54:17 55:11,  
 21 63:19  
 DEPONENT 66:1  
 deposited 4:4 5:1, 7  
 DEPOSITION 1:13,  
 17 4:24 7:18, 19  
 10:3 15:5, 6 16:13  
 17:8, 11 20:4, 18  
 64:11, 16 65:3  
 depositions 8:5  
 deputy 14:8, 9, 12  
 27:7 31:1  
 describe 28:12  
 described 18:2  
 designee 9:25  
 destination 32:14  
 determination 48:18  
 determine 38:24  
 48:20 62:3

determined 38:18  
 55:18  
 development 30:24  
 31:10, 12 58:4  
 devices 6:19 15:19  
 diagnoses 25:4  
 dictated 47:11  
 different 12:3 16:25  
 17:21 26:8 28:20  
 33:16 36:25 45:17  
 50:5, 8 51:4, 10 55:8  
 56:23 62:23 63:4, 16  
 differently 63:11  
 DIRECT 2:20 18:5  
 21:10 43:12  
 directives 60:23  
 directly 13:1 14:14  
 director 11:25 12:4,  
 6 13:9, 18, 23, 24  
 14:12, 14 27:6, 7, 8, 9,  
 10 30:25 31:1  
 directs 6:16  
 disciplinary 8:20  
 49:23  
 discipline 56:10  
 discuss 8:5  
 discussed 11:15  
 Discussion 15:21  
 21:16 27:2, 3, 5  
 disease 12:17  
 distribute 46:25  
 distributed 46:23, 24  
 distributing 31:23  
 distribution 31:15, 17,  
 19, 21 32:1, 7, 14  
 DISTRICT 1:1  
 Division 12:1, 8, 10,  
 25 13:14 14:3, 12  
 15:1 17:2, 3, 24 27:6  
 divisions 18:10, 13,  
 14, 18  
 DOCCS 39:17 40:7,  
 22 54:19  
 doctor 10:22 39:19,  
 24 40:4, 20, 22, 23  
 41:5, 16  
 doctors 40:22  
 document 22:3, 6, 8,  
 14, 17 23:1, 15, 25  
 26:24 35:14

documentation 44:4,  
 19 47:20  
 documents 6:23 7:2,  
 8, 20  
 doing 55:11 60:6  
 62:11  
 DR 1:13, 17 3:3 4:2  
 21:24 22:5 64:8  
 66:3, 12  
 draft 58:2  
 drafted 45:19, 20  
 55:3 57:18, 19, 22, 24  
 Drake 20:13  
 drugs 7:13  
 duly 4:3  
 duties 53:22

## &lt; E &gt;

earlier 25:25  
 Eastern 1:19  
 education 56:12  
 Einstein 11:13  
 either 30:3 32:18  
 58:18  
 electronic 31:25  
 32:3, 6  
 else's 64:12  
 E-mail 24:22  
 employee 34:18, 24  
 65:7, 8  
 employees 34:21  
 employment 11:18  
 encompass 61:14  
 encompassed 18:3  
 engineering 10:17  
 ensure 58:10  
 ensures 32:16  
 entail 16:15  
 entities 42:3  
 environment 44:5  
 environments 55:9  
 Errata 66:7 67:2  
 ESQUIRE 2:6, 7, 12  
 established 49:22  
 establishing 19:2  
 Estate 1:4 4:9  
 estimate 25:16, 17, 18  
 et 1:5 6:21

**evaluation** 57:16  
 58:11, 12 59:22 60:5, 8  
**evaluations** 57:12  
 58:22  
**events** 24:9 63:9  
**evidence** 21:17 23:6  
**exact** 9:17 25:23  
 56:16  
**exactly** 9:22 60:11  
 64:14  
**Examination** 3:4 4:5  
**examples** 63:16  
**executive** 27:9  
**Exhibit** 3:8, 9 7:4  
 21:17, 18, 22, 25  
 22:12, 15 23:2, 6, 9, 22  
**existed** 33:22  
**expectation** 48:8  
**expected** 37:12  
**expires** 66:16  
**explain** 29:2, 3, 25  
**explaining** 10:9  
  
**< F >**  
**facilities** 13:2, 7, 13  
 29:20 35:20 36:6  
 43:9 44:7, 8 49:5  
 55:14 63:6  
**facility** 16:24 19:17  
 28:6 34:7, 21 35:23  
 36:12, 16, 17, 24 37:4, 6  
 42:13, 17, 21 43:25  
 44:13, 19, 25 45:12  
 48:12, 24 49:23 50:3, 14  
 56:4 59:4 60:19, 23  
 61:3, 7, 21  
**facility-based** 34:5  
**fact** 19:13  
**factor** 59:5, 10, 12  
**factors** 36:25 51:5, 7  
 59:15, 16, 20, 21  
**facts** 19:9, 12  
**familiar** 38:7 52:17  
**family** 62:8 63:14  
**feel** 5:22 48:3 58:15  
**fellowship** 11:13, 20  
**Field** 4:20 11:4

**Fifth** 4:21  
**filed** 8:23 21:13  
**fill** 60:3  
**financially** 65:10  
**findings** 45:1  
**fine** 23:17  
**finished** 22:6, 8  
 23:10, 24  
**firm** 4:8  
**first** 4:3 17:1 23:1  
**fitness** 12:15  
**five-minute** 62:15  
 64:2  
**flexibility** 37:14  
**Floor** 2:5 4:21  
**focuses** 17:25  
**folks** 17:22  
**follow** 32:17 34:16  
 42:13 44:13  
**followed** 41:23 43:4, 8  
 45:22 55:5, 13, 18  
 58:8, 10, 13 62:4  
**following** 42:3, 6, 17, 22, 23 43:5  
**follows** 4:4 55:14  
**footprint** 18:7  
**foregoing** 65:4 66:4  
**forensic** 11:5, 12, 21  
 12:1, 8, 10, 11, 25  
 13:14 14:4, 13 17:2, 4  
 27:7  
**forensics** 18:1, 3  
**form** 66:7  
**formal** 18:17  
**found** 12:14, 17  
**foundation** 60:3  
**frame** 17:16  
**free** 5:22  
**frequently** 37:22  
**Friday** 15:8  
**front** 7:2, 8  
**full** 4:10, 15  
**further** 29:2 64:5  
 65:7  
  
**< G >**  
**GENERAL** 2:10  
 37:12 39:10, 11, 16  
 41:22 48:15 50:16  
 52:1 58:4 61:7

**generally** 25:2 29:23, 25  
**General's** 20:10  
**getting** 37:11  
**Gina** 1:19 65:2, 15  
**give** 6:2 7:15 25:16  
 31:7  
**given** 56:22, 25 66:5  
**gives** 62:10  
**go** 4:23 10:12, 14, 18, 20  
 11:1 15:20 26:13, 18  
 35:5 37:4, 6 44:6, 8  
 50:21 51:17 53:11  
 60:20  
**God** 15:14  
**goes** 30:20 52:23  
 54:20  
**going** 4:23 6:7  
 15:14, 18 18:20  
 20:19 21:2, 9 23:4, 18, 21  
 28:14, 15, 16  
 35:5 42:11 51:4  
 62:15 63:3 64:14  
**Good** 4:7  
**gotten** 61:9  
**graduate** 10:18 11:1  
**grievances** 8:23  
**ground** 4:23  
**guess** 32:5 61:5  
**guessing** 9:18 32:9  
**guidance** 49:13  
**guided** 47:12  
**guidelines** 38:3

**< H >**  
**HACH** 2:5  
**Hal** 16:18  
**handful** 9:12  
**happen** 37:16, 17  
**happened** 45:5, 7  
 49:2 51:5 60:18  
 62:5  
**happening** 62:24  
 63:6  
**happens** 12:19 49:23  
**hard** 6:7  
**head** 6:3 25:15 28:1  
 57:10  
**Health** 4:20 11:25  
 12:20 14:21 17:18

18:11, 23, 25 19:1, 3, 7  
 35:21, 25 36:7, 12, 19  
 38:17 41:23  
 48:17, 22 49:6, 8  
 50:15, 17 53:23  
 54:21 55:15 56:22  
 60:17  
**hear** 5:21 24:18  
 59:7  
**heard** 24:15  
**hearing** 54:24  
**hearings** 5:5 9:9, 10, 11, 13 10:1  
**held** 15:21 21:16  
**help** 4:24 13:2  
**helping** 13:12  
**hierarchy** 36:18  
**HILLARY** 2:7  
**hindsight** 63:11  
**historical** 59:20 60:1  
**history** 11:19  
**home** 51:17  
**Hospital** 11:21  
**hour** 8:2  
**hours** 62:16  
**housed** 35:23  
**Housing** 52:17, 20, 22  
 53:1, 8, 10  
**Houston** 8:15  
**hygiene** 5:5 9:13  
 12:24  
**Hypotheticals** 37:19

**< I >**  
**idea** 44:10  
**ideation** 48:9, 16  
 49:7  
**identification** 21:22  
 23:22  
**identify** 29:8 30:3  
 46:6  
**illness** 27:15, 19  
 47:2, 5, 9, 17 49:19  
 50:3, 12, 19  
**illnesses** 33:3  
**imagine** 32:2  
**impact** 33:17  
**impacted** 30:9  
**important** 6:2 51:3

**improve** 29:10, 15  
 46:8 55:10  
**improved** 63:13  
**improvement** 29:5  
**inaccuracy** 26:1  
**in-between** 37:15, 16,  
 20 38:4  
**incarcerated** 25:8  
**incident** 55:17 56:3  
**include** 12:13  
**included** 29:5  
**includes** 61:24  
**including** 7:21 27:12  
 63:10  
**increased** 37:21  
**increases** 59:12  
**individual** 25:4 37:1  
 45:11 48:15, 17 53:2  
 55:22 59:25 63:7, 8  
**individually** 48:19  
**individuals** 12:14, 16,  
 21 31:2 38:16, 18  
 50:15, 18, 19 51:11,  
 16  
**influence** 7:13  
**information** 16:11  
 20:10 24:23, 25 25:3,  
 4, 6 26:9, 12 35:7, 15  
 38:20 51:3 60:1, 3  
 62:1  
**infraction** 53:3, 10  
**initial** 38:12  
**initiate** 54:20  
**inmate** 16:16 36:23  
 38:23 39:2, 18, 23  
 40:3, 9, 17, 20 41:5,  
 16 47:2, 5, 8, 16, 25  
 48:3, 8, 11 49:7  
 51:19 52:6, 10, 19, 25  
 54:4, 8  
**inmates** 27:14, 18  
 33:3 35:18 38:8  
 39:8 45:13 49:18  
**inmate's** 54:5  
**Inpatient** 11:21  
 12:22 18:6 59:3  
**inpatient-level** 50:20  
**inside** 49:14 50:25  
**insight** 13:10

**intended** 50:19  
**interact** 15:3  
**interested** 65:10  
**internal** 28:6 30:11  
 43:12 61:24  
**internally** 26:21  
**intervention** 55:19,  
 20 56:7  
**interventions** 55:25  
**interview** 59:25  
**investigators** 24:9  
**involve** 27:6  
**involved** 27:3 28:11  
 30:25 31:1, 11, 23  
 35:3 46:18, 25 56:5  
 58:3, 6 61:9  
**involves** 28:7  
**iPad** 6:20  
**Israel** 11:11  
**issue** 29:9 37:23  
**issues** 29:11 51:10  
**items** 54:8, 11  
**its** 1:4

## &lt; J &gt;

**Jeremy** 14:10  
**join** 34:17  
**joint** 28:18 30:4  
 43:23, 24 44:24 45:3  
 46:12 57:3  
**jointly** 36:8 57:24  
**Joseph** 1:4 4:9  
 24:13, 15  
**judgment** 37:15  
 38:6 47:12  
**July** 8:13  
**JUNE** 1:14, 18 65:12  
**jurisdictions** 12:12  
 13:5  
**Justice** 42:4 61:23  
 62:7

## &lt; K &gt;

**KALKACH** 2:6 3:4  
 4:6, 8, 13, 16 15:11,  
 16, 18, 23 18:9 19:5,  
 15 20:15 21:12, 15,  
 17, 21, 23 22:1, 4, 11,  
 13 23:4, 8, 20, 23  
 24:4, 6 27:20 33:1

35:9 36:22 38:1, 11,  
 21 39:6 40:8, 13, 24  
 41:10, 21 42:5, 10, 16  
 43:1, 21 44:11, 17  
 45:18 46:1 47:6, 13,  
 22 48:6, 21 49:3, 17  
 50:1, 7 51:6 52:3, 16,  
 24 53:17 54:15  
 58:17 59:9 61:2, 16  
 62:12, 17, 21, 22 63:2,  
 23 64:5  
**keep** 23:16 32:18  
**keeping** 34:15  
**kept** 61:4  
**key** 18:2  
**kids** 8:18  
**kind** 5:4 9:24 10:8  
 24:24 31:3 51:3  
 52:14 55:19, 20 56:7  
**kinds** 9:10 13:7  
 37:11 55:22  
**King** 1:4, 5 4:9  
 19:16, 19, 22 24:13,  
 16 35:23  
**knew** 63:13, 14, 15  
**know** 6:10 14:15, 16,  
 21 15:18 16:18, 19  
 17:5 18:16 19:9, 12,  
 13 20:14 22:5 23:10,  
 24, 25 24:13, 14 25:8  
 27:22 28:13, 14  
 29:21, 23 30:13, 16  
 31:6, 12, 14, 16, 18, 21,  
 25 32:10, 11, 12, 13,  
 16, 19, 20, 24 33:10  
 34:7, 13, 14, 18 35:1,  
 7, 11, 16, 25 36:4  
 38:3 41:19 43:16  
 44:10 46:14, 20, 23,  
 24 49:11 52:11, 25  
 53:13, 20, 22, 25 54:2,  
 24 57:1, 2, 10, 15, 18,  
 19, 21 58:3 59:18  
 60:11, 15 61:1, 3, 6,  
 10, 17, 18  
**knowledge** 65:5  
**known** 17:12 63:12  
**knows** 55:7

## &lt; L &gt;

**large** 16:10, 14  
**late** 12:4  
**law** 4:8 9:13  
**lawsuit** 9:1 10:6  
 16:9 20:1, 3 21:13  
 24:10, 11  
**layers** 41:25  
**lead** 63:22  
**leading** 11:19  
**learn** 33:20, 21, 23  
 34:3 63:17  
**learned** 63:18  
**LEE** 1:13, 17 3:3  
 4:2, 7, 18, 23 21:24  
 22:5 23:15 64:6, 9  
 66:3, 12  
**L-e-e** 4:18  
**left** 11:24 37:14, 15  
**legal** 12:15  
**lesson** 63:18  
**level** 35:21, 25 36:7  
 37:2, 21 56:4  
**levels** 50:5, 8  
**L-i** 4:18  
**licenses** 10:24  
**licensing** 11:16 17:23  
**LINE** 67:4  
**link** 7:4  
**linked** 46:10  
**list** 59:15, 16, 18, 19  
**little** 24:23 29:2  
 35:5  
**live** 50:18  
**lives** 51:18  
**living** 52:1  
**LI-WEN** 1:13, 17  
 3:3 4:2, 18 66:3, 12  
**LLP** 2:5  
**local** 12:12 13:5  
**location** 25:3 45:4  
 51:15  
**locations** 44:2  
**log** 61:4, 8  
**logistically** 36:9  
**long** 5:2 8:1 13:14  
 17:5 33:8 57:9  
 60:13, 15  
**longer** 12:3 17:6

**look** 18:17 27:5, 25  
29:8 44:3, 5, 18  
60:20 62:4 63:20  
**looked** 14:25  
**looking** 29:15 30:17  
33:10, 14, 25 38:16  
63:9  
**lose** 45:5, 9  
**lost** 15:9  
**lot** 27:23 32:6  
33:16 59:19  
**lots** 63:16

< M >  
**Madison** 2:5  
**major** 10:16  
**management** 7:24  
12:16, 23 29:5 30:25  
41:3  
**mandated** 12:13  
**mandatory** 35:2  
**manual** 27:24 33:6  
**Margaret** 20:13 21:6,  
8  
**Maria** 14:16  
**Marie** 14:15  
**mark** 23:6  
**marked** 21:19, 22  
22:15 23:2, 22  
**MARKS** 2:20  
**married** 8:16  
**MD** 40:23  
**mean** 4:12 9:21  
11:9 18:16 22:16  
26:1 33:19, 24 40:12  
42:23 43:16 44:25  
47:14 49:16, 25  
50:12 53:4  
**means** 5:24  
**meant** 26:2 62:3, 4  
**mechanism** 43:13, 14,  
15  
**med** 11:1  
**medical** 10:19, 20, 22,  
23 11:3, 12, 25 12:4,  
5 13:9, 18, 22, 24  
14:13 27:6 28:7  
39:16, 17, 18, 20, 23  
40:3, 7, 20, 22, 23  
41:2 47:15

**medical-medical**  
40:22  
**medication** 39:7, 19,  
25 40:1, 4 41:3  
**medications** 5:17  
39:9, 11  
**medicine** 10:25 11:14  
**meet** 8:1  
**meeting** 16:24 26:23  
**meetings** 26:25  
27:11, 12  
**member** 63:15  
**memorized** 33:7  
**Mental** 4:20 5:5  
9:13 11:25 12:17, 20,  
24 14:20 17:18  
18:10, 22, 25 19:1, 3,  
6 27:15, 18 33:3  
35:21, 25 36:12, 19  
38:17 41:23 47:2, 5,  
9, 16 48:16, 22 49:6,  
8, 19 50:3, 12, 15, 17,  
19 53:23 54:21  
55:15 56:22 60:17  
**mentioned** 49:9  
**Meyers** 16:18  
**Mid-State** 35:24  
36:11, 16 60:19, 23  
61:3  
**mind** 62:13  
**minimally** 37:13  
**minimum** 40:1  
**minute** 21:24 23:9  
62:12  
**minutes** 64:1  
**mission** 19:6  
**Mm-hmm** 57:7  
**modification** 29:12  
**month** 20:18  
**monthly** 37:14 40:15  
**morning** 4:7  
**move** 18:20 23:4  
63:23  
**moved** 12:4  
**multiple** 41:25  
**mute** 6:21

< N >

**name** 4:7, 10, 15, 18  
14:1, 9 43:14 61:17,  
18  
**names** 8:8 20:12  
21:3 27:21, 22  
**NAPPI** 2:7 64:14  
**nature** 5:6  
**navigating** 13:12  
**NECESSARILY** 2:20  
**need** 4:15 6:9 12:15  
18:17 27:24 30:3, 8  
33:6 34:16, 22 37:10  
38:17, 19 40:15  
48:13, 25 50:15, 20  
51:4 52:15 59:4  
**needed** 20:9 36:10  
38:20  
**needs** 38:24 45:2  
49:7 50:6 59:2  
61:19 62:6  
**negative** 46:6  
**never** 34:24 60:14  
61:9 62:13  
**NEW** 1:1 2:6, 10, 12  
4:19, 20, 21 11:12  
16:22 18:23 19:3, 7,  
17 24:19 26:17, 21  
27:7, 17 28:3, 16  
31:22 32:13 34:14,  
18, 24 35:13 36:12,  
20 39:15 42:1 43:25  
45:1, 12, 20 56:21  
**nod** 6:3  
**NORTHERN** 1:1  
**Notary** 66:19  
**noted** 66:7  
**notes** 62:18 64:1  
**notice** 24:20, 21 25:1,  
2  
**noticed** 15:12  
**notices** 25:10, 21  
26:1, 5 64:11  
**notification** 24:20, 22  
25:7  
**notifications** 61:22  
62:10  
**notified** 20:8 62:6, 8,  
9  
**notify** 61:22, 23

**Number** 3:7 25:14,  
22, 23 26:5 51:4  
**numbered** 1:18  
57:17  
**numbers** 26:16  
**nurse** 39:14

< O >  
**oath** 5:12, 14  
**object** 6:16 21:9  
**objection** 9:10 17:19  
18:24 19:11 27:16  
32:23 35:8 36:14  
37:18 38:9, 15 39:4  
40:5, 11, 21 41:7, 18,  
24 42:8, 14, 19 43:19  
44:9, 15 45:15, 25  
47:3, 10, 18 48:2, 14  
49:1, 15, 20 50:4  
51:1, 22 52:13, 21  
53:14 54:10 58:14  
59:6 60:25 61:12  
62:25  
**objective** 18:22  
**obliged** 32:22  
**obtain** 36:6  
**occasional** 9:9  
**occurred** 24:23  
**occurs** 62:6  
**odd** 18:16  
**offender** 12:23  
**offer** 21:17  
**offered** 12:21  
**off-hours** 54:20  
**OFFICE** 2:10 4:20  
11:24 13:12 14:20  
17:18, 22 18:10, 22,  
25 19:6 20:11 36:12  
55:15 61:22 62:7  
**official** 26:24 27:1  
57:11, 13, 16 58:12  
**Oh** 15:14 33:24  
62:13  
**Okay** 4:14 6:4, 5, 13,  
17, 18, 22 7:1, 7, 11,  
17 9:7 10:2 12:7  
13:14 19:9 20:12, 21  
21:7 22:11 23:4  
24:4 26:4 30:17  
31:14, 25 35:17, 20



|  |  |   |  |
|--|--|---|--|
| <p>36:23 38:7 46:23<br/>48:23 50:8 56:24<br/>58:1 59:22 61:11<br/>62:20 63:23 64:3<br/><b>older</b> 7:20<br/><b>OMH</b> 9:12 12:1, 10,<br/>11 17:2 20:14 21:11<br/>26:6 28:4 36:8, 20<br/>55:13 57:4<br/><b>Once</b> 5:2 26:23<br/>34:12 40:1 41:3<br/>51:13<br/><b>ones</b> 6:24, 25 33:5<br/>51:7<br/><b>one-time</b> 29:9<br/><b>ongoing</b> 26:16 33:9<br/><b>opened</b> 38:19<br/><b>opening</b> 7:4<br/><b>operated</b> 36:17<br/><b>operations</b> 16:23<br/>27:8<br/><b>opinion</b> 63:4<br/><b>opportunities</b> 63:12<br/><b>opposed</b> 6:3<br/><b>options</b> 16:5<br/><b>order</b> 20:19 53:10<br/><b>organization</b> 28:8<br/>41:22 55:13, 15<br/><b>organized</b> 17:18 18:5<br/><b>oriented</b> 34:21<br/><b>outcome</b> 46:6 59:13<br/><b>outcomes</b> 29:7<br/><b>outpatient</b> 18:7<br/><b>outside</b> 42:3 50:11<br/><b>overall</b> 15:1 51:9<br/><b>overarching</b> 63:21<br/><b>overseeing</b> 30:21<br/>31:5<br/><b>oversees</b> 41:22 45:22<br/>55:5 58:8, 12</p> <p>&lt; P &gt;<br/><b>p.m</b> 64:17<br/><b>packet</b> 58:25<br/><b>PAGE</b> 3:2 22:9 67:4<br/><b>pages</b> 66:4<br/><b>paper</b> 7:2, 8 31:25<br/>32:3, 4, 7<br/><b>parole</b> 54:24</p> | <p><b>part</b> 16:10, 14 52:14<br/><b>participating</b> 15:2<br/><b>particular</b> 51:15<br/><b>parties</b> 13:7 65:8<br/><b>partly</b> 59:24<br/><b>party</b> 9:1<br/><b>pass</b> 32:20<br/><b>patient</b> 16:17 37:19,<br/>22<br/><b>patients</b> 13:5<br/><b>pays</b> 57:5, 6 64:11<br/><b>peer</b> 63:14<br/><b>peers</b> 62:2<br/><b>Peggy</b> 20:13 21:5<br/><b>pending</b> 59:1<br/><b>people</b> 21:3 30:14<br/>32:17, 22 34:16<br/>48:12, 24 49:9, 18<br/>50:3, 24 52:1 58:1, 3<br/>60:8<br/><b>performed</b> 59:23<br/><b>performing</b> 60:8<br/><b>performs</b> 60:5<br/><b>period</b> 17:1<br/><b>permanently</b> 51:15<br/><b>person</b> 21:5, 6 30:16<br/>31:6, 18 34:5 40:15<br/>42:23 48:19 50:12<br/>51:2 53:25 57:19, 21,<br/>22, 24 58:15 61:20<br/>64:10<br/><b>personally</b> 9:2 17:15<br/><b>person's</b> 53:22 56:10<br/>59:13<br/><b>phone</b> 6:20<br/><b>place</b> 44:13<br/><b>placed</b> 51:15 54:4<br/><b>Plaintiff</b> 1:5 2:4 4:9<br/><b>plan</b> 45:2<br/><b>please</b> 4:10, 17 5:22<br/>6:9, 19, 23 21:3, 18,<br/>24 22:1, 5 23:7, 9<br/>29:2 45:6 47:23<br/>62:12<br/><b>points</b> 56:23<br/><b>policies</b> 7:22, 23<br/>19:2 27:17, 21 28:2,<br/>4, 5, 6, 13 29:19, 20<br/>30:8, 22 31:5, 9 33:2,<br/>22, 24, 25 34:2, 6, 23</p> | <p>35:1, 17 41:2, 23<br/>42:3 44:14, 20 45:13,<br/>16, 17, 19, 22, 24<br/>46:15, 17, 19, 21<br/>47:19 49:12, 21, 24<br/>51:19 55:18 57:17,<br/>23 58:2, 10, 11 59:11<br/>60:22 61:11, 13, 14<br/>62:3<br/><b>policy</b> 5:8 10:9<br/>27:14, 24 28:7, 10, 11,<br/>15, 17, 19, 21, 23, 25<br/>29:1, 12, 22 30:8, 18,<br/>24 31:3, 10, 11, 14, 21,<br/>22 32:13, 16, 21, 22<br/>33:18 34:16 35:12<br/>40:7, 16, 19 41:8, 11,<br/>17, 19 42:7, 13, 18, 22,<br/>24 43:3, 4, 5, 9 46:7<br/>47:1, 8, 11 49:13<br/>55:1, 2, 3, 4, 5, 7, 12<br/>57:11, 15, 18, 22 58:4,<br/>8, 13<br/><b>population</b> 37:12<br/>50:16 52:1<br/><b>populations</b> 12:13<br/><b>portion</b> 63:24<br/><b>portions</b> 18:20 23:5<br/><b>position</b> 11:19, 20, 25<br/>14:1 30:14 31:18<br/>53:20 57:21<br/><b>positions</b> 58:1<br/><b>possible</b> 4:25 45:4, 9<br/><b>potential</b> 54:6 58:25<br/><b>practice</b> 28:15, 25<br/>30:6 47:12 55:10<br/>64:12<br/><b>practiced</b> 64:13<br/><b>practices</b> 7:25 29:6<br/>41:2<br/><b>practitioner</b> 39:14<br/><b>preliminary</b> 25:6<br/><b>pre-pandemic</b> 9:19<br/><b>prepare</b> 7:17<br/><b>prescribe</b> 39:19, 24<br/>40:4<br/><b>prescribing</b> 39:7<br/><b>present</b> 8:3<br/><b>presentation</b> 51:9, 12<br/><b>prevent</b> 62:24 63:5</p> | <p><b>prevention</b> 27:9, 13<br/>55:1 56:13<br/><b>primary</b> 37:13 40:12<br/>60:6<br/><b>prior</b> 64:15<br/><b>prison</b> 12:20<br/><b>prisons</b> 50:11<br/><b>problem</b> 29:8 46:6,<br/>10<br/><b>problems</b> 29:11<br/><b>procedure</b> 24:20<br/>61:19<br/><b>proceedings</b> 12:16<br/><b>process</b> 28:10 29:21<br/>30:10 31:11, 22<br/>35:11 46:16, 20<br/>47:25 48:4, 25 49:4,<br/>10 55:17 56:3, 4, 6<br/>61:24 62:11<br/><b>processes</b> 35:6<br/><b>Professional</b> 1:20<br/>65:2<br/><b>program</b> 11:16<br/>12:22 16:5 28:16<br/>47:20<br/><b>programs</b> 6:23<br/>12:23 49:21 50:22<br/><b>projects</b> 14:23 15:1<br/><b>promoting</b> 19:2<br/><b>proposed</b> 33:17<br/><b>propounded</b> 66:6<br/><b>Prosequendum</b> 1:5<br/><b>provide</b> 13:9 27:18<br/>50:23 56:17 60:2<br/><b>provided</b> 13:11 36:19<br/><b>provides</b> 24:23 34:7,<br/>10 57:2<br/><b>providing</b> 13:1, 3<br/>19:1<br/><b>provision</b> 10:7<br/><b>psyche</b> 30:1 33:24<br/>34:1<br/><b>Psychiatric</b> 12:11<br/>16:22 18:4, 5 28:3<br/>29:4 36:20, 21 39:13,<br/>15, 20, 24 42:1 43:25<br/>45:1, 21<br/><b>psychiatrist</b> 11:22<br/>37:13 39:14 40:23</p> |
|--|--|---|--|

**Psychiatry** 11:5, 13, 21  
**psychological** 7:21  
**psychologist** 27:9  
**Psychotropic** 39:9  
**public** 19:1 66:19  
**pull** 30:8  
**purview** 39:17  
**put** 6:21 17:16 21:18 33:17 44:12 54:6, 9 64:8

## &lt; Q &gt;

**qualified** 30:10  
**quality** 29:5 30:24 43:13  
**question** 5:21, 23, 24, 25 6:12, 16 7:3 15:22 16:1 22:25 30:20 41:14 47:4 61:9  
**questions** 31:12 44:5 62:18 64:5, 7 66:5  
**quickly** 4:24 41:6, 9, 17  
**quite** 17:16  
**QUOTATION** 2:20  
**QUOTE** 2:20 19:8

## &lt; R &gt;

**range** 26:7  
**RCTP** 54:21  
**reach** 12:18 15:24  
**reached** 16:1  
**read** 15:22 22:2, 10, 22, 24 23:3 33:2, 5, 8, 9, 13 64:9 66:4  
**Realtime** 1:20, 21  
**reason** 12:17 52:19 54:6  
**reasons** 16:25 52:25  
**Reassessed** 52:8 58:25  
**receive** 24:21 26:6 34:17 38:23 39:2 52:11 56:20, 21 60:16  
**received** 10:23 25:10, 21

**receives** 56:15  
**Recess** 64:4  
**recognize** 22:14, 18, 19 23:25 24:2  
**recognizes** 22:3  
**record** 4:11 15:20, 21 21:15, 16 62:2, 21 64:8 65:5  
**recorded** 24:8  
**recurring** 26:13  
**redone** 58:25 59:2, 4  
**reevaluated** 52:7  
**refer** 33:18  
**REFLECT** 2:20  
**reframe** 41:14  
**regarding** 16:6 27:14 33:2 35:17 45:13 49:14  
**REGIONAL** 2:10  
**Registered** 1:20 65:2  
**regular** 40:4  
**related** 5:8 7:20 9:13 24:9, 11 28:25 39:13 53:2, 9  
**relationship** 14:19 16:20 36:11  
**relationships** 13:12  
**relative** 65:8  
**remember** 5:10 9:17, 22 10:5 17:17 21:13 24:25 25:23 41:8 57:17  
**REMOTE** 1:13, 17  
**remotely** 2:2  
**repeat** 5:22 21:3 45:6  
**rephrase** 5:22 21:2 47:7 63:3  
**report** 13:17, 18, 22 14:5, 6 26:11, 23 27:1 47:25 48:4 49:4  
**reported** 13:24 65:3  
**Reporter** 1:20, 21 6:3, 7 65:3  
**reporters** 24:9  
**reporting** 48:16  
**reports** 14:11, 13, 14 48:9 49:7

**represents** 4:8  
**request** 40:6  
**requests** 41:5, 16  
**requirement** 28:19 30:5 46:11  
**residency** 11:9, 11  
**respond** 41:9 63:18  
**responding** 29:17  
**responsibilities** 12:8 13:3  
**responsibility** 30:24  
**responsible** 12:11, 17 49:11  
**responsive** 18:21 23:5 63:24  
**restoration** 12:15  
**restrictions** 54:23  
**result** 29:11  
**retention** 9:10  
**retraining** 55:21  
**return** 12:15 51:17  
**returning** 59:4  
**review** 7:23, 24 21:24 23:9 29:6, 7 30:10, 14 41:25 42:3 44:25 46:5 55:17 56:3, 6 61:24 62:18 64:1  
**reviewed** 7:20 58:25  
**reviewing** 22:6, 8 23:24 43:13 58:6 62:2  
**reviews** 29:11  
**revise** 30:10, 14, 17  
**revisions** 58:6  
**right** 1:5 4:12 14:1  
**risk** 7:24 45:16 46:8 51:23 55:2, 12 57:12, 13 58:11, 22 59:5, 10, 12, 15, 16, 20, 22 60:4  
**risks** 58:25  
**role** 9:12 12:5, 6 13:9 14:21  
**roles** 12:7  
**room** 7:11  
**ROSE** 2:5  
**RPR** 65:15  
**rules** 4:23 53:5

**run** 4:24 52:22

## &lt; S &gt;

**sanction** 44:20  
**sanctions** 44:12  
**sat** 34:24  
**saying** 6:8 24:22  
**says** 48:3  
**schedule** 34:13  
**SCHIRRIPA** 2:5  
**school** 10:18, 19, 20 11:1, 2  
**Scratch** 43:7, 17 47:24 48:23  
**screen** 6:24  
**screened** 52:11  
**screening** 38:7, 10, 12, 14, 16, 22, 24  
**scroll** 22:2  
**scrolling** 23:16  
**second** 15:20  
**sector** 19:1  
**security** 53:6  
**see** 15:10, 12, 15, 16 22:3 23:1 26:3 33:6 37:7, 8, 10, 12, 22 39:18, 23 40:3, 9, 15, 17, 20 41:5, 16 61:6 64:1  
**seen** 22:16, 21, 23, 24 23:19 24:1, 2 37:23 59:19  
**send** 52:19 53:7  
**sending** 52:25  
**sense** 37:21  
**sent** 20:9 24:20 53:10  
**separate** 13:21 39:22  
**serious** 50:19 52:8  
**Services** 12:1, 9, 10, 21, 25 13:1, 3, 6, 11, 14 14:4, 13 17:3, 4 18:5, 6 19:1, 3, 4 27:7, 18 33:17 36:10, 18, 19 37:3, 11 38:17, 19 50:16, 23 58:24  
**session** 37:16, 21  
**sessions** 37:15 38:4  
**set** 28:16 36:10

|   |   |   |  |
|---|---|---|--|
| <p>sex 12:23<br/> <b>Sheet</b> 66:8<br/> <b>shoelaces</b> 19:19, 23<br/> 35:18, 19 51:20 52:1<br/> <b>show</b> 23:7<br/> <b>showing</b> 6:25 22:11<br/> <b>side</b> 17:22, 25 43:12<br/> 49:6 53:15<br/> <b>sign</b> 64:9<br/> <b>signed</b> 24:7<br/> <b>silent</b> 6:21<br/> <b>similar</b> 50:10<br/> <b>single</b> 19:13 57:24<br/> <b>site</b> 36:19<br/> <b>situations</b> 13:13<br/> 62:24<br/> <b>skills</b> 65:5<br/> <b>slew</b> 27:17<br/> <b>small</b> 23:11<br/> <b>smoothly</b> 4:25<br/> <b>social</b> 40:9, 17<br/> <b>solution</b> 63:22<br/> <b>somebody</b> 20:8<br/> 58:24 63:13, 17<br/> <b>somewhat</b> 22:25<br/> <b>sooner</b> 37:23<br/> <b>sorry</b> 5:19 9:5, 22<br/> 11:7 20:25 21:1, 5<br/> 23:11 25:25 39:20<br/> 41:14 46:2 59:7<br/> <b>sort</b> 59:13<br/> <b>sound</b> 18:16<br/> <b>South</b> 2:11<br/> <b>speak</b> 20:7, 16 30:10<br/> 40:6 41:1 48:1<br/> <b>speaking</b> 20:20<br/> 21:11 24:12 35:6<br/> 48:11<br/> <b>speaks</b> 57:11<br/> <b>special</b> 49:14, 16, 18<br/> 50:25 52:17, 20, 22<br/> 53:1, 8, 10, 11<br/> <b>specialize</b> 11:4, 6, 8<br/> <b>specific</b> 11:4 19:9<br/> 29:13, 15 30:16 31:6,<br/> 12 35:10 36:24<br/> 42:11 46:10 50:2<br/> 56:8 57:19 58:3, 15<br/> 61:18</p> | <p><b>specifically</b> 31:16<br/> 35:19 60:21 61:1<br/> <b>specifies</b> 40:16, 19<br/> <b>spectrum</b> 50:23<br/> <b>spelled</b> 4:15<br/> <b>spent</b> 22:17<br/> <b>spoke</b> 7:19 15:7, 8<br/> 17:14 21:4<br/> <b>spoken</b> 17:15 24:8<br/> <b>sporadic</b> 33:11<br/> <b>stable</b> 51:25<br/> <b>staff</b> 28:7 34:5, 15<br/> 36:20 42:23 44:4<br/> 49:5 54:19 56:10, 17,<br/> 19, 21, 23 57:8 60:17<br/> 62:1, 11<br/> <b>stakeholders</b> 13:4<br/> <b>stand</b> 12:14<br/> <b>Standard</b> 1:19 54:8,<br/> 11<br/> <b>start</b> 61:24<br/> <b>started</b> 17:2<br/> <b>starting</b> 25:9 26:2<br/> <b>STATE</b> 2:10, 11<br/> 4:10, 19 12:20, 21<br/> 18:23 19:3, 7, 17<br/> <b>statements</b> 24:7, 8<br/> <b>state-operated</b> 19:4<br/> <b>STATES</b> 1:1 41:11,<br/> 13, 17<br/> <b>statutes</b> 33:16<br/> <b>statutorily</b> 12:13<br/> <b>stay</b> 50:16<br/> <b>steps</b> 30:11 48:10<br/> <b>stop</b> 22:11<br/> <b>Street</b> 2:11<br/> <b>stressors</b> 59:21<br/> <b>strike</b> 18:20 23:4<br/> 26:4 63:23<br/> <b>strokes</b> 13:8<br/> <b>structural</b> 47:19<br/> <b>structure</b> 18:8 30:1<br/> 47:20 50:10 58:5, 9,<br/> 20<br/> <b>structured</b> 50:18<br/> <b>subject</b> 8:20<br/> <b>Subscribed</b> 65:11<br/> 66:14<br/> <b>substance</b> 16:2<br/> 20:21 21:7 66:7</p> | <p><b>suicidal</b> 48:3, 9, 16<br/> 49:7<br/> <b>suicide</b> 16:16, 17<br/> 19:16, 20, 23 24:19,<br/> 22 26:18 27:8, 13<br/> 28:22 45:14, 16 46:8<br/> 48:1, 12 50:24 51:2,<br/> 11, 14, 17, 20 52:6, 9,<br/> 10 53:13, 24 54:2, 4,<br/> 5, 9 55:1, 2, 12 56:12<br/> 57:12, 13 58:11, 22<br/> 59:22 60:3 61:4, 7,<br/> 11, 13, 15, 20, 21 62:5,<br/> 6<br/> <b>suicided</b> 25:5<br/> <b>suicides</b> 26:13 60:18,<br/> 24 63:5, 7, 10, 20<br/> <b>Suite</b> 2:11<br/> <b>Sullivan</b> 14:15, 16<br/> <b>sum</b> 16:2 20:21 21:7<br/> <b>supervises</b> 31:9<br/> <b>supervision</b> 18:8<br/> 30:2, 19 38:22 39:1<br/> 52:12 55:23 58:20<br/> <b>supervisor</b> 56:9<br/> <b>supervisors</b> 42:2<br/> 56:5<br/> <b>supervisory</b> 58:5, 9<br/> <b>support</b> 50:20<br/> <b>suppose</b> 57:8 63:17<br/> <b>supposed</b> 32:17<br/> 52:11<br/> <b>sure</b> 28:12 32:13<br/> 33:12 36:2 40:18<br/> 47:4 49:24 56:1<br/> 64:12<br/> <b>sustaining</b> 53:2<br/> <b>sworn</b> 4:4 65:11<br/> 66:14<br/> <b>symptoms</b> 51:8<br/> <b>SYRACUSE</b> 2:10, 12<br/> <b>system</b> 43:8<br/> <b>systemic</b> 29:9<br/> <b>systems</b> 13:6 29:4<br/> <br/> <b>&lt; T &gt;</b><br/> <b>take</b> 5:15 6:3, 13<br/> 21:24 23:9, 14 47:16<br/> 62:4, 14, 19 63:25<br/> 64:2</p> | <p><b>taken</b> 1:17 11:15<br/> 61:20 64:4 65:11<br/> <b>takes</b> 48:10 60:1<br/> <b>talk</b> 6:6 20:1 26:16,<br/> 19 27:10, 13 44:4<br/> 47:19<br/> <b>talked</b> 17:13 59:7<br/> <b>talking</b> 47:23 62:1<br/> <b>talks</b> 26:21<br/> <b>taught</b> 32:17<br/> <b>team</b> 30:18 31:8<br/> 52:5 53:23 54:21<br/> 58:18<br/> <b>technical</b> 10:1<br/> <b>TECHNICIAN</b> 21:19<br/> 22:1 23:14 24:5<br/> <b>tell</b> 33:7 44:25<br/> 47:20<br/> <b>telling</b> 36:3<br/> <b>term</b> 10:1 53:16, 18<br/> <b>terms</b> 12:18 16:12<br/> 18:2 30:23 36:9<br/> 37:4 54:22<br/> <b>testified</b> 4:4 5:3 9:3<br/> 10:2<br/> <b>testify</b> 5:18 20:4, 9,<br/> 18<br/> <b>testimony</b> 7:14<br/> <b>Texas</b> 8:15 10:13<br/> 11:3<br/> <b>Thank</b> 4:22 22:12<br/> 24:4 64:5<br/> <b>theoretically</b> 45:4, 9<br/> <b>therapist</b> 37:13 38:3<br/> 40:12 60:6<br/> <b>thing</b> 6:11 24:24<br/> <b>things</b> 28:20 55:8<br/> 60:2 62:4 63:10<br/> <b>think</b> 8:2 9:5, 17<br/> 15:9 16:10 20:17<br/> 29:3, 16 30:23 33:6<br/> 36:3 42:21 49:5<br/> 56:1<br/> <b>thinking</b> 19:14<br/> <b>thought</b> 21:1 37:20<br/> <b>thoughts</b> 16:4<br/> <b>three</b> 43:24 62:17<br/> <b>Time</b> 1:19 5:2 6:7,<br/> 9 9:16 12:2 13:25<br/> 15:7 17:14, 15, 16</p> |
|---|---|---|--|



20:17 22:17 23:1  
 24:19 30:17 32:20  
 51:12 57:8 63:12  
 64:6  
**times** 6:15 14:24  
 16:23 17:12 39:18,  
 23 40:3  
**title** 12:3 14:7  
**today** 4:24 5:12, 18  
 6:9, 15, 25 15:8  
 24:15 60:21  
**today's** 7:17, 19 8:5  
**told** 9:3 10:2  
**tool** 57:14 59:17  
**top** 25:14 27:25  
 57:10  
**track** 32:18  
**train** 34:12  
**trained** 60:8, 12  
**training** 11:9, 11  
 32:21 34:2, 6, 8, 9, 10,  
 11, 13, 17, 19, 23, 25  
 35:1, 4 49:11 56:12,  
 17, 18, 24 57:3, 5, 9  
 60:16  
**trainings** 56:23  
 60:13, 14  
**transcript** 64:11 65:4  
**transcription** 66:5  
**transferred** 59:1  
**transgender** 5:8 10:7  
**treat** 47:8, 14, 21  
**treatment** 5:9 9:9,  
 11 10:7 38:23, 25  
 39:1, 13, 16, 20, 21, 24  
 47:11, 12, 14, 15, 23  
 49:14, 16, 18 50:5, 9,  
 11, 15, 21 52:5, 12, 15  
 54:21  
**trend** 28:22, 24 29:1,  
 14, 15  
**trends** 26:14, 18, 19,  
 21 27:5 63:21  
**trial** 5:3, 4 12:14  
**tried** 50:24  
**trigger** 28:20, 23, 24  
 29:1  
**true** 65:4  
**truthfully** 5:18

**try** 26:14 29:10  
 47:7 55:10 61:25  
 62:5 63:17, 18  
**trying** 9:5 22:9  
 29:3 32:11 37:20  
 50:22 59:13  
**Tuesday** 15:8  
**turn** 6:19  
**twice** 26:19  
**two** 21:3 62:15  
**type** 9:14  
**Typically** 64:10  
  
**< U >**  
**understand** 5:12, 21  
 20:19, 25 26:14 28:9  
 30:12 33:18 38:2  
 42:15 44:16 62:5  
**understanding** 6:1  
 13:10 57:23  
**understood** 5:25  
 29:18 51:10  
**unfit** 12:14  
**unique** 63:8  
**Unit** 11:21, 23 48:17  
 49:8 50:17, 19 51:24  
 52:17, 20 53:1, 8, 10  
**UNITED** 1:1  
**units** 45:17 52:22  
 60:17  
**University** 10:13  
 11:3  
**update** 28:15, 17, 21  
 29:20 30:6 32:21  
 46:7, 9, 12, 21  
**updated** 28:13 31:5,  
 14 45:24 55:7  
**updates** 30:22  
**updating** 29:19, 22  
 35:12 46:14, 16, 19  
**usual** 25:2  
**usually** 25:6 33:14  
  
**< V >**  
**variation** 56:16  
**varies** 25:22  
**various** 17:12  
**verbal** 6:2  
**verdict** 12:19

**VIDEO** 1:13, 17  
 15:9 21:19 23:14  
**visit** 44:1  
**voluntary** 35:2  
  
**< W >**  
**walk** 11:18 23:15  
**want** 14:25 23:14,  
 16, 25 25:16 28:9  
 34:18 36:2 48:16  
 62:14, 18 64:8  
**wanted** 16:4 46:7  
**WARD** 1:5  
**watch** 6:20 53:13, 24  
 54:2, 4, 7, 9 61:4, 8  
**watches** 54:20  
**way** 7:14 15:11  
 29:3 43:3  
**well** 12:12, 16, 22  
 13:4, 12 17:20 18:7  
 19:2 36:16 46:9, 13  
**W-e-n** 4:18  
**went** 10:19  
**we're** 6:8 13:1  
 33:25 64:14  
**we've** 62:15  
**Williams** 1:19 65:2,  
 15  
**wind** 38:18  
**WITNESS** 3:2 4:3  
 9:24 10:8 23:17  
**word** 22:2  
**words** 6:4  
**work** 4:19 13:15  
 20:2 42:2 43:18  
 46:18 53:23  
**worker** 40:10, 17  
**working** 12:11 13:2  
 17:2, 3 26:6 39:14  
**works** 16:22 29:25  
**writing** 6:8 57:24  
**written** 24:7  
  
**< Y >**  
**YAMILE** 2:6 4:7  
**Yeah** 4:13 21:9  
 25:18 26:7 62:20  
**year** 9:17 10:5  
 17:17 25:11, 12 26:3,

6, 8, 14, 20  
**yearly** 26:11  
**years** 9:15 10:5  
 19:23 43:24 63:20  
**YORK** 1:1 2:6, 10,  
 12 4:19, 20, 21 11:12  
 16:22 18:23 19:3, 7,  
 17 24:19 26:17, 21  
 27:17 28:3 34:14  
 35:13 36:13, 20  
 39:15 42:1 43:25  
 45:1, 12, 20  
**York's** 27:7  
  
**< Z >**  
**Zoom** 6:24

**WORD LIST**

&lt; 1 &gt;

10 (7)

10:06 (1)

10001 (1)

10016 (1)

10th (1)

112 (1)

12 (1)

12:10 (1)

13202 (1)

15 (1)

17 (2)

17th (1)

18 (1)

1974 (1)

1992 (1)

1996 (2)

&lt; 2 &gt;

2 (1)

20 (1)

2000 (2)

2008 (5)

2013 (3)

2018 (7)

2019 (1)

2022 (5)

20-CV-01413 (1)

21 (1)

23 (1)

&lt; 3 &gt;

300 (2)

330 (1)

365 (2)

&lt; 4 &gt;

4 (1)

&lt; 6 &gt;

6 (1)

&lt; 8 &gt;

8 (2)

&lt; 9 &gt;

90 (3)

9th (1)

&lt; A &gt;

a.m (1)

ability (2)

able (1)

above-styled (1)

access (3)

accommodate (1)

account (1)

accreditation (11)

accredited (1)

accrediting (1)

accuracy (1)

accurate (1)

accurately (1)

ACKNOWLEDGMEN

T (1)

ACTION (5)

actions (1)

actual (1)

acute (2)

ad (1)

additional (2)

address (4)

addressed (2)

adequate (1)

admin (1)

administrates (1)

administration (6)

administrative (1)

Administrator (1)

admitted (3)

Adult (1)

adverse (1)

affect (4)

age (1)

agency (3)

agency's (1)

ago (3)

AIMEE (3)

al (1)

Albert (1)

alcohol (1)

allowed (1)

Amended (2)

amount (1)

Amy (1)

Ann (2)

annually (2)

Answer (11)

answered (2)

answers (3)

anybody (1)

apparently (1)

appearing (1)

Apple (1)

apply (1)

appointments (1)

appoints (1)

approach (2)

appropriate (8)

approval (1)

approves (1)

approximate (2)

approximately (1)

approximation (1)

area (2)

areas (2)

Article (6)

asked (3)

asking (9)

assess (1)

assessed (3)

assessment (13)

assign (1)

assigned (3)

assist (1)

associate (4)

assortment (1)

assume (2)

assumption (1)

attached (1)

attempt (3)

attempted (4)

attend (1)

attending (1)

attention (1)

ATTORNEY (5)

attorneys (2)

audience (1)

audit (1)

audits (1)

automatic (1)

autopsy (1)

available (1)

Avenue (2)

avoid (1)

aware (20)

&lt; B &gt;

back (8)

based (2)

basic (2)

basis (4)

Beginning (6)

behalf (2)

believe (3)

Bellevue (2)

best (2)

Beth (1)

better (3)

beyond (1)

bit (3)

board (1)

born (2)

Branch (1)

break (5)

Breaking (1)

brief (1)

briefly (1)

broad (2)

Bronx (1)

bureaus (1)

business (1)

&lt; C &gt;

called (2)

call-out (1)

capacity (1)

caption (1)

Captioner (1)

care (6)

case (8)

caseload (1)

cause (1)

cell (1)

Center (16)

Centers (6)

central (20)

certain (1)

CERTIFICATE (1)

certification (1)

Certified (2)

certify (3)

cetera (1)

chances (1)

change (18)

**CHANGE/REASON** (1)  
**changed** (3)  
**changes** (2)  
**charge** (10)  
**check** (2)  
**Chemical** (1)  
**CHEVERIE** (1)  
**chief** (2)  
**Children's** (1)  
**choose** (1)  
**circumstances** (6)  
**City** (2)  
**CIVIL** (3)  
**CLARITY** (1)  
**clinical** (13)  
**clinically** (2)  
**clinician** (7)  
**clinicians** (1)  
**clinic-level** (1)  
**close** (1)  
**CNYPC** (14)  
**CNYPC's** (1)  
**college** (2)  
**combination** (3)  
**come** (6)  
**comes** (2)  
**coming** (1)  
**commander** (1)  
**commencing** (1)  
**commission** (12)  
**commissioner** (11)  
**commissioner's** (1)  
**commit** (4)  
**commits** (1)  
**committed** (4)  
**communicated** (1)  
**communication** (2)  
**community** (5)  
**company** (1)  
**Complaint** (3)  
**complaints** (2)  
**completed** (2)  
**compliance** (1)  
**complicated** (1)  
**complying** (2)  
**components** (1)  
**computers** (1)  
**concern** (2)

**concluded** (1)  
**conclusion** (1)  
**conduct** (1)  
**confused** (1)  
**connect** (1)  
**connected** (1)  
**connecting** (1)  
**consequence** (1)  
**consequences** (5)  
**consider** (1)  
**considerations** (2)  
**considered** (2)  
**consistent** (2)  
**contacted** (1)  
**contain** (1)  
**contains** (1)  
**context** (1)  
**continuing** (1)  
**continuous** (1)  
**continuously** (1)  
**contributing** (1)  
**control** (1)  
**conversation** (8)  
**convicted** (1)  
**coordinating** (1)  
**correct** (3)  
**Correction** (1)  
**correctional** (31)  
**correctional-based** (1)  
**Corrections** (14)  
**corrections-based** (2)  
**corrective** (1)  
**counsel** (8)  
**count** (1)  
**couple** (1)  
**COURT** (6)  
**courtroom** (1)  
**covered** (1)  
**COWAN** (60)  
**co-workers** (1)  
**creates** (2)  
**creating** (1)  
**creation** (1)  
**crime** (1)  
**crisis** (2)  
**CRR** (1)  
**current** (3)  
**currently** (2)  
**custody** (1)

**CYNPC** (5)  
**< D >**  
**daily** (2)  
**Darman** (1)  
**date** (3)  
**day** (2)  
**days** (6)  
**day-to-day** (1)  
**deal** (2)  
**decide** (8)  
**decided** (7)  
**decides** (2)  
**deciding** (2)  
**decision** (2)  
**decisions** (6)  
**defect** (1)  
**Defendant** (1)  
**Defendants** (1)  
**defined** (1)  
**definitely** (1)  
**degree** (1)  
**deliver** (1)  
**delivered** (4)  
**delivery** (1)  
**demographic** (1)  
**Department** (15)  
**depend** (8)  
**depending** (4)  
**depends** (11)  
**DEPONENT** (1)  
**deposed** (3)  
**DEPOSITION** (17)  
**depositions** (1)  
**deputy** (5)  
**describe** (1)  
**described** (1)  
**designee** (1)  
**destination** (1)  
**determination** (1)  
**determine** (3)  
**determined** (2)  
**development** (4)  
**devices** (2)  
**diagnoses** (1)  
**dictated** (1)  
**different** (18)  
**differently** (1)  
**DIRECT** (4)

**directives** (1)  
**directly** (2)  
**director** (16)  
**directs** (1)  
**disciplinary** (2)  
**discipline** (1)  
**discuss** (1)  
**discussed** (1)  
**Discussion** (5)  
**disease** (1)  
**distribute** (1)  
**distributed** (2)  
**distributing** (1)  
**distribution** (7)  
**DISTRICT** (2)  
**Division** (12)  
**divisions** (5)  
**DOCCS** (4)  
**doctor** (9)  
**doctors** (1)  
**document** (10)  
**documentation** (3)  
**documents** (4)  
**doing** (3)  
**DR** (9)  
**draft** (1)  
**drafted** (7)  
**Drake** (2)  
**drugs** (1)  
**duly** (1)  
**duties** (1)  
**< E >**  
**earlier** (1)  
**Eastern** (1)  
**education** (1)  
**Einstein** (1)  
**either** (3)  
**electronic** (4)  
**else's** (1)  
**E-mail** (1)  
**employee** (4)  
**employees** (1)  
**employment** (1)  
**encompass** (1)  
**encompassed** (1)  
**engineering** (1)  
**ensure** (1)  
**ensures** (1)

entail (1)  
 entities (1)  
 environment (1)  
 environments (1)  
 Errata (2)  
 ESQUIRE (3)  
 established (1)  
 establishing (1)  
 Estate (2)  
 estimate (3)  
 et (2)  
 evaluation (6)  
 evaluations (2)  
 events (2)  
 evidence (2)  
 exact (3)  
 exactly (3)  
 Examination (2)  
 examples (1)  
 executive (1)  
 Exhibit (13)  
 existed (1)  
 expectation (1)  
 expected (1)  
 expires (1)  
 explain (3)  
 explaining (1)

## &lt; F &gt;

facilities (12)  
 facility (32)  
 facility-based (1)  
 fact (1)  
 factor (3)  
 factors (7)  
 facts (2)  
 familiar (2)  
 family (2)  
 feel (3)  
 fellowship (2)  
 Field (2)  
 Fifth (1)  
 filed (2)  
 fill (1)  
 financially (1)  
 findings (1)  
 fine (1)  
 finished (4)  
 firm (1)

first (3)  
 fitness (1)  
 five-minute (2)  
 flexibility (1)  
 Floor (2)  
 focuses (1)  
 folks (1)  
 follow (4)  
 followed (11)  
 following (6)  
 follows (2)  
 footprint (1)  
 foregoing (2)  
 forensic (14)  
 forensics (2)  
 form (1)  
 formal (1)  
 found (2)  
 foundation (1)  
 frame (1)  
 free (1)  
 frequently (1)  
 Friday (1)  
 front (2)  
 full (2)  
 further (3)

## &lt; G &gt;

GENERAL (11)  
 generally (3)  
 General's (1)  
 getting (1)  
 Gina (3)  
 give (4)  
 given (3)  
 gives (1)  
 go (18)  
 God (1)  
 goes (3)  
 going (20)  
 Good (1)  
 gotten (1)  
 graduate (2)  
 grievances (1)  
 ground (1)  
 guess (2)  
 guessing (2)  
 guidance (1)  
 guided (1)

guidelines (1)

## &lt; H &gt;

HACH (1)  
 Hal (1)  
 handful (1)  
 happen (2)  
 happened (6)  
 happening (2)  
 happens (2)  
 hard (1)  
 head (4)  
 Health (29)  
 hear (3)  
 heard (1)  
 hearing (1)  
 hearings (7)  
 held (2)  
 help (2)  
 helping (1)  
 hierarchy (1)  
 HILLARY (1)  
 hindsight (1)  
 historical (2)  
 history (1)  
 home (1)  
 Hospital (1)  
 hour (1)  
 hours (1)  
 housed (1)  
 Housing (6)  
 Houston (1)  
 hygiene (3)  
 Hypotheticals (1)

## &lt; I &gt;

idea (1)  
 ideation (3)  
 identification (2)  
 identify (3)  
 illness (10)  
 illnesses (1)  
 imagine (1)  
 impact (1)  
 impacted (1)  
 important (2)  
 improve (4)  
 improved (1)  
 improvement (1)

inaccuracy (1)  
 in-between (4)  
 incarcerated (1)  
 incident (2)  
 include (1)  
 included (1)  
 includes (1)  
 including (3)  
 increased (1)  
 increases (1)  
 individual (10)  
 individually (1)  
 individuals (11)  
 influence (1)  
 information (16)  
 infraction (2)  
 initial (1)  
 initiate (1)  
 inmate (29)  
 inmates (8)  
 inmate's (1)  
 Inpatient (4)  
 inpatient-level (1)  
 inside (2)  
 insight (1)  
 intended (1)  
 interact (1)  
 interested (1)  
 internal (4)  
 internally (1)  
 intervention (3)  
 interventions (1)  
 interview (1)  
 investigators (1)  
 involve (1)  
 involved (13)  
 involves (1)  
 iPad (1)  
 Israel (1)  
 issue (3)  
 issues (2)  
 items (2)  
 its (1)

## &lt; J &gt;

Jeremy (1)  
 join (1)  
 joint (8)  
 jointly (2)

Joseph (4)  
 judgment (3)  
 July (1)  
 JUNE (3)  
 jurisdictions (2)  
 Justice (3)

## &lt; K &gt;

KALKACH (77)  
 keep (2)  
 keeping (1)  
 kept (1)  
 key (1)  
 kids (1)  
 kind (10)  
 kinds (4)  
 King (9)  
 knew (3)  
 know (89)  
 knowledge (1)  
 known (2)  
 knows (1)

## &lt; L &gt;

large (2)  
 late (1)  
 law (2)  
 lawsuit (8)  
 layers (1)  
 lead (1)  
 leading (1)  
 learn (5)  
 learned (1)  
 LEE (15)  
 L-e-e (1)  
 left (3)  
 legal (1)  
 lesson (1)  
 level (6)  
 levels (2)  
 L-i (1)  
 licenses (1)  
 licensing (2)  
 LINE (1)  
 link (1)  
 linked (1)  
 list (4)  
 little (3)  
 live (1)

lives (1)  
 living (1)  
 LI-WEN (7)  
 LLP (1)  
 local (2)  
 location (3)  
 locations (1)  
 log (2)  
 logistically (1)  
 long (8)  
 longer (2)  
 look (10)  
 looked (1)  
 looking (7)  
 lose (2)  
 lost (1)  
 lot (4)  
 lots (1)

## &lt; M &gt;

Madison (1)  
 major (1)  
 management (6)  
 mandated (1)  
 mandatory (1)  
 manual (2)  
 Margaret (3)  
 Maria (1)  
 Marie (1)  
 mark (1)  
 marked (5)  
 MARKS (1)  
 married (1)  
 MD (1)  
 mean (17)  
 means (1)  
 meant (3)  
 mechanism (3)  
 med (1)  
 medical (28)  
 medical-medical (1)  
 medication (6)  
 medications (4)  
 medicine (2)  
 meet (1)  
 meeting (2)  
 meetings (3)  
 member (1)  
 memorized (1)

Mental (43)  
 mentioned (1)  
 Meyers (1)  
 Mid-State (6)  
 mind (1)  
 minimally (1)  
 minimum (1)  
 minute (3)  
 minutes (1)  
 mission (1)  
 Mm-hmm (1)  
 modification (1)  
 month (1)  
 monthly (2)  
 morning (1)  
 move (3)  
 moved (1)  
 multiple (1)  
 mute (1)

## &lt; N &gt;

name (9)  
 names (5)  
 NAPPI (2)  
 nature (1)  
 navigating (1)  
 NECESSARILY (1)  
 need (23)  
 needed (3)  
 needs (7)  
 negative (1)  
 never (4)  
 NEW (37)  
 nod (1)  
 NORTHERN (1)  
 Notary (1)  
 noted (1)  
 notes (2)  
 notice (4)  
 noticed (1)  
 notices (5)  
 notification (3)  
 notifications (2)  
 notified (4)  
 notify (3)  
 Number (6)  
 numbered (2)  
 numbers (1)  
 nurse (1)

## &lt; O &gt;

oath (2)  
 object (2)  
 objection (46)  
 objective (1)  
 obliged (1)  
 obtain (1)  
 occasional (1)  
 occurred (1)  
 occurs (1)  
 odd (1)  
 offender (1)  
 offer (1)  
 offered (1)  
 off-hours (1)  
 OFFICE (17)  
 official (6)  
 Oh (3)  
 Okay (40)  
 older (1)  
 OMH (13)  
 Once (6)  
 ones (4)  
 one-time (1)  
 ongoing (2)  
 opened (1)  
 opening (1)  
 operated (1)  
 operations (2)  
 opinion (1)  
 opportunities (1)  
 opposed (1)  
 options (1)  
 order (2)  
 organization (4)  
 organized (2)  
 oriented (1)  
 outcome (2)  
 outcomes (1)  
 outpatient (1)  
 outside (2)  
 overall (2)  
 overarching (1)  
 overseeing (2)  
 oversees (5)

## &lt; P &gt;

p.m (1)

packet (1)  
 PAGE (3)  
 pages (1)  
 paper (6)  
 parole (1)  
 part (3)  
 participating (1)  
 particular (1)  
 parties (2)  
 partly (1)  
 party (1)  
 pass (1)  
 patient (3)  
 patients (1)  
 pays (3)  
 peer (1)  
 peers (1)  
 Peggy (2)  
 pending (1)  
 people (15)  
 performed (1)  
 performing (1)  
 performs (1)  
 period (1)  
 permanently (1)  
 person (19)  
 personally (2)  
 person's (3)  
 phone (1)  
 place (1)  
 placed (2)  
 Plaintiff (3)  
 plan (1)  
 please (17)  
 points (1)  
 policies (58)  
 policy (68)  
 population (3)  
 populations (1)  
 portion (1)  
 portions (2)  
 position (8)  
 positions (1)  
 possible (3)  
 potential (2)  
 practice (6)  
 practiced (1)  
 practices (3)  
 practitioner (1)

preliminary (1)  
 pre-pandemic (1)  
 prepare (1)  
 prescribe (3)  
 prescribing (1)  
 present (1)  
 presentation (3)  
 prevent (2)  
 prevention (4)  
 primary (3)  
 prior (1)  
 prison (1)  
 prisons (1)  
 problem (3)  
 problems (1)  
 procedure (2)  
 proceedings (1)  
 process (19)  
 processes (1)  
 Professional (2)  
 program (6)  
 programs (4)  
 projects (2)  
 promoting (1)  
 proposed (1)  
 propounded (1)  
 Prosequendum (1)  
 provide (5)  
 provided (2)  
 provides (4)  
 providing (3)  
 provision (1)  
 psyche (3)  
 Psychiatric (16)  
 psychiatrist (4)  
 Psychiatry (4)  
 psychological (1)  
 psychologist (1)  
 Psychotropic (1)  
 public (2)  
 pull (1)  
 purview (1)  
 put (8)  
  
 < Q >  
 qualified (1)  
 quality (4)  
 question (14)  
 questions (6)

quickly (4)  
 quite (1)  
 QUOTATION (1)  
 QUOTE (2)  
  
 < R >  
 range (1)  
 RCTP (1)  
 reach (3)  
 reached (1)  
 read (13)  
 Realtime (2)  
 reason (3)  
 reasons (2)  
 Reassessed (2)  
 receive (9)  
 received (3)  
 receives (1)  
 Recess (1)  
 recognize (5)  
 recognizes (1)  
 record (9)  
 recorded (1)  
 recurring (1)  
 redone (3)  
 reevaluated (1)  
 refer (1)  
 REFLECT (1)  
 reframe (1)  
 regarding (6)  
 REGIONAL (1)  
 Registered (2)  
 regular (1)  
 related (9)  
 relationship (3)  
 relationships (1)  
 relative (1)  
 remember (10)  
 REMOTE (2)  
 remotely (1)  
 repeat (3)  
 rephrase (4)  
 report (11)  
 reported (2)  
 Reporter (5)  
 reporters (1)  
 reporting (1)  
 reports (5)  
 represents (1)

request (1)  
 requests (2)  
 requirement (3)  
 residency (2)  
 respond (2)  
 responding (1)  
 responsibilities (2)  
 responsibility (1)  
 responsible (3)  
 responsive (3)  
 restoration (1)  
 restrictions (1)  
 result (1)  
 retention (1)  
 retraining (1)  
 return (2)  
 returning (1)  
 review (18)  
 reviewed (2)  
 reviewing (6)  
 reviews (1)  
 revise (3)  
 revisions (1)  
 right (3)  
 risk (21)  
 risks (1)  
 role (5)  
 roles (1)  
 room (1)  
 ROSE (1)  
 RPR (1)  
 rules (2)  
 run (2)  
  
 < S >  
 sanction (1)  
 sanctions (1)  
 sat (1)  
 saying (2)  
 says (1)  
 schedule (1)  
 SCHIRIPA (1)  
 school (5)  
 Scratch (4)  
 screen (1)  
 screened (1)  
 screening (7)  
 scroll (1)  
 scrolling (1)



|                  |                    |                   |                   |
|------------------|--------------------|-------------------|-------------------|
| second (1)       | spectrum (1)       | sustaining (1)    | training (25)     |
| sector (1)       | spelled (1)        | sworn (3)         | trainings (3)     |
| security (1)     | spent (1)          | symptoms (1)      | transcript (2)    |
| see (25)         | spoke (5)          | SYRACUSE (2)      | transcription (1) |
| seen (9)         | spoken (2)         | system (1)        | transferred (1)   |
| send (2)         | sporadic (1)       | systemic (1)      | transgender (2)   |
| sending (1)      | stable (1)         | systems (2)       | treat (3)         |
| sense (1)        | staff (17)         |                   | treatment (29)    |
| sent (3)         | stakeholders (1)   | < T >             | trend (5)         |
| separate (2)     | stand (1)          | take (12)         | trends (6)        |
| serious (2)      | Standard (3)       | taken (5)         | trial (3)         |
| Services (32)    | start (1)          | takes (2)         | tried (1)         |
| session (2)      | started (1)        | talk (8)          | trigger (4)       |
| sessions (2)     | starting (2)       | talked (2)        | true (1)          |
| set (2)          | STATE (10)         | talking (3)       | truthfully (1)    |
| sex (1)          | statements (2)     | talks (1)         | try (8)           |
| Sheet (1)        | state-operated (1) | taught (1)        | trying (7)        |
| shoelaces (6)    | STATES (4)         | team (6)          | Tuesday (1)       |
| show (1)         | statutes (1)       | technical (1)     | turn (1)          |
| showing (2)      | statutorily (1)    | TECHNICIAN (4)    | twice (1)         |
| side (6)         | stay (1)           | tell (3)          | two (2)           |
| sign (1)         | steps (2)          | telling (1)       | type (1)          |
| signed (1)       | stop (1)           | term (3)          | Typically (1)     |
| silent (1)       | Street (1)         | terms (7)         |                   |
| similar (1)      | stressors (1)      | testified (4)     | < U >             |
| single (2)       | strike (4)         | testify (4)       | understand (12)   |
| site (1)         | strokes (1)        | testimony (1)     | understanding (3) |
| situations (2)   | structural (1)     | Texas (3)         | understood (3)    |
| skills (1)       | structure (7)      | Thank (4)         | unfit (1)         |
| slew (1)         | structured (1)     | theoretically (2) | unique (1)        |
| small (1)        | subject (1)        | therapist (4)     | Unit (12)         |
| smoothly (1)     | Subscribed (2)     | thing (2)         | UNITED (1)        |
| social (2)       | substance (4)      | things (5)        | units (3)         |
| solution (1)     | suicidal (4)       | think (15)        | University (2)    |
| somebody (4)     | suicide (50)       | thinking (1)      | update (10)       |
| somewhat (1)     | suicided (1)       | thought (2)       | updated (5)       |
| sooner (1)       | suicides (7)       | thoughts (1)      | updates (1)       |
| sorry (13)       | Suite (1)          | three (2)         | updating (6)      |
| sort (1)         | Sullivan (2)       | Time (22)         | usual (1)         |
| sound (1)        | sum (3)            | times (7)         | usually (2)       |
| South (1)        | supervises (1)     | title (2)         |                   |
| speak (6)        | supervision (8)    | today (9)         | < V >             |
| speaking (5)     | supervisor (1)     | today's (3)       | variation (1)     |
| speaks (1)       | supervisors (2)    | told (2)          | varies (1)        |
| special (11)     | supervisory (2)    | tool (2)          | various (1)       |
| specialize (3)   | support (1)        | top (3)           | verbal (1)        |
| specific (17)    | suppose (2)        | track (1)         | verdict (1)       |
| specifically (4) | supposed (2)       | train (1)         | VIDEO (5)         |
| specifies (2)    | sure (9)           | trained (2)       | visit (1)         |

**voluntary** (1)

**< W >**

**walk** (2)

**want** (12)

**wanted** (2)

**WARD** (1)

**watch** (9)

**watches** (1)

**way** (4)

**well** (11)

**W-e-n** (1)

**went** (1)

**we're** (4)

**we've** (1)

**Williams** (3)

**wind** (1)

**WITNESS** (5)

**word** (1)

**words** (1)

**work** (8)

**worker** (2)

**working** (6)

**works** (2)

**writing** (2)

**written** (1)

**< Y >**

**YAMILE** (2)

**Yeah** (5)

**year** (10)

**yearly** (1)

**years** (5)

**YORK** (30)

**York's** (1)

**< Z >**

**Zoom** (1)